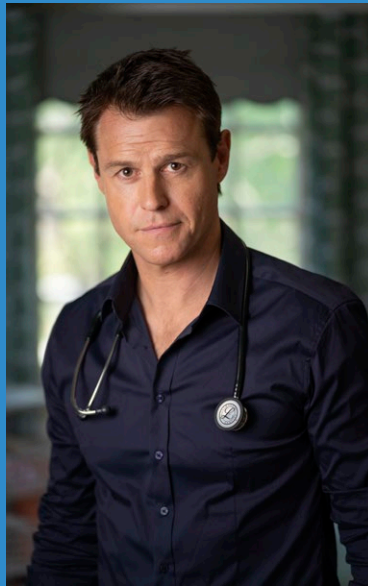


Nine

Modern Slavery Statement



Celebrating 190 years of journalism

The Sydney Morning Herald

INDEPENDENT. ALWAYS.

12 page anniversary special

How Sydney has grown up with the Herald
KARLY BRADOCK PAGE 4

There are things our readers deserve to know
KATE MCLEOD PAGE 4

The joy of being part of a grand history
ROSE GIBBS PAGE 4

A legacy of credibility sacred to our democracy
PETER BEECHER PAGE 4



Modern Slavery Statement

1. INTRODUCTION

This is the Modern Slavery Statement issued by Nine Entertainment Co. Holdings Limited ACN 122 203 892 (**Nine**), under the *Modern Slavery Act 2018* (Cth) for the year to 30 June 2021. It is issued on behalf of Nine and its related bodies corporate (**Nine Group**), other than Domain Holdings Australia Limited ACN 094 154 364 and its subsidiaries¹.

2. NINE'S STRUCTURE AND OPERATIONS

The Nine Group is Australia's largest, locally owned, media company, with investments spanning television, video on demand, print, digital and radio. The Nine Group's assets include the Nine television network, video on demand platform 9Now, talkback radio stations 2GB, 3AW, 4BC and 6PR, major mastheads in The Sydney Morning Herald, The Age and The Australian Financial Review, digital properties such as nine.com.au, 9Honey, PedestrianTV and Drive, subscription video platform Stan, and a majority investment in Domain.

Key activities of the Nine Group's operations include the production and distribution of content (across multiple platforms and genres of content), the acquisition of content produced by third parties, and the sale of advertising inventory and sponsorships. Nine is a participant in a number of joint ventures which provide operational services to the Nine Group, including playout, transmission and news helicopters for the television business, and content licensing services for the publishing business. It is also a member of a number of industry bodies, including The Premium Content Alliance, FreeTV, Commercial Radio Australia, the Australian Press Council and Freeview.

The Nine Group operates across Australia, with primary operations in Sydney, Melbourne, Brisbane, Perth, Adelaide, Darwin and Newcastle, as well as having a sales office in New Zealand, and news bureaus in a number of locations around the world including the USA, Indonesia, and the United Kingdom. Nine has approximately 4,500 employees.

Nine is the ultimate holding company of the Nine Group, with its headquarters located in Sydney. It is a public company, incorporated in Australia and listed on the ASX.

The Nine Group's annual revenue for the year to 30 June 2021 was \$2.33 billion.

The Nine Group operates under broadly common policies and processes and its operations are within the same, broad, media sector. As such, it is appropriate to provide a single statement for the Nine Group. As the ultimate holding company of the Nine Group, Nine has the required knowledge of the group's operations to prepare this statement. Staff involved in the preparation of this statement have consulted with necessary business operation areas to gather the necessary information to prepare this statement on behalf of the Nine Group.

3. OUR SUPPLY CHAINS

Our supply chains include:

- Suppliers of content across Nine's business, which include large international studios providing content produced for international distribution, large international producers who are commissioned to produce local content for Nine, small local content houses, freelance writers, performers and contributors;
- Sporting bodies in Australia and overseas from whom Nine acquires content rights;
- Equipment suppliers ranging from specialist broadcast technical equipment and bulk paper supplies for printing to standard office equipment and cars to clothing;
- Licensing agencies and other media companies, which license rights to content such as photographs and audio-visual content to the Nine Group;
- Acquisition of advertising (where Nine is advertising its products and services on platforms outside the Nine Group) and production of advertising content;
- Service suppliers, including printing, delivery of newspapers, labour hire businesses who supply specialist services, such as camera operators at outdoor sporting events, building management, security and contract cleaning suppliers; and
- Technology and communications services acquired on standard commercial terms; and
- Delivery partners who provide specialised services such as professional or broadcast services and non-core, repeatable services, such as some finance operations.

Nine's suppliers are located in over 46 countries around the world, but, by value of expenditure, are predominantly located in Australia, USA, England, Ireland and the Netherlands. These countries are all rated low for prevalence of modern slavery practices on the last available Global Slavery Index².

1. Domain Holdings Australia Limited has prepared a separate Modern Slavery Statement for the operations of that group of companies.

2. <https://www.globallslaveryindex.org/>

Modern Slavery Statement

4. NINE'S COMMITMENT TO HUMAN RIGHTS

As Australia's largest, locally owned, media company, Nine recognises that it is a part of the communities in which it operates, including the communities where Nine's content is accessed, those where Nine produces the content or the communities where Nine's people, suppliers and partners live and work. Nine knows that in order to succeed, it must commit to upholding respect for human rights and that includes ensuring modern slavery risks are identified and, where possible, addressed.

5. NINE'S RISKS OF MODERN SLAVERY PRACTICES

The Nine Group considers that the nature and location of its operations means that the risks of modern slavery practices in its supply chains are low. Similarly, Nine's risk of contributing to modern slavery practices by its suppliers is considered low, based on Nine's review of its major suppliers' assessments of their own modern slavery risks and our knowledge of their operations.

Our employees are primarily skilled professionals, and so are not from vulnerable groups where slavery is a risk. Nine has appropriate work place management policies and practices, along with skilled managers and access to external advisers, to ensure appropriate recruitment and management of employees, including compliance with minimum remuneration requirements.

Nine does not regularly work with children. Where children may feature in programming which Nine is producing, Nine typically engages children through talent agencies, ensuring that the correct remuneration is paid given the work involved and the child's age. Nine is also fully aware of the regulatory requirements relating to working with children, and is committed to complying with applicable requirements, where it is necessary to engage children for such work.

Our operations are in countries with high standards of protection for employees and the rights of individuals. We acquire content from reputable producers who also primarily operate in countries with equivalent protections for employees and other individuals. Our other primary suppliers across all categories of goods and services are also located in Australia or in other countries which do not pose a high degree of risk of modern slavery practices.

Where Nine has contracted with a third party to produce programming solely for Nine, Nine will have staff closely involved in the production, giving a first hand ability to identify any concerns about the way in which the production is being undertaken. This gives Nine confidence in this part of its supply chain.

Where Nine acquires services such as cleaning (which is an area that is identified as being at risk of modern slavery practices in areas such as deceptive recruitment or forced labour), that is done through Australian based contractors who are committed to operating their business in an ethical manner, including ensuring workers are properly treated in all respects.

Notwithstanding the above, Nine is continuing to look deeper into its supply chains, enhancing its capability to identify modern slavery risks and improving its supplier due diligence, onboarding and compliance monitoring processes, as set out in this statement.

6. DUE DILIGENCE PROCESSES FOR MODERN SLAVERY

There are a number of policies, processes and practices across Nine which minimise the risk of Nine contributing to modern slavery practices.

The Nine Group generally obtains goods and services from suppliers who are reputable, substantial commercial entities. Nine has often dealt with those suppliers over many years, which provides Nine with confidence in the quality of their operations.

The Nine Group has HR, risk, finance and legal teams whose roles include ensuring compliance with laws and internal policies and processes across the business. A number of those policies, including Nine's Code of Conduct, Occupational Health and Safety Policy and Workplace Harassment, Discrimination and Bullying Policy, are designed to ensure that Nine's business is conducted in accordance with ethical and responsible business practices which will reduce the risks of slavery practices arising.

The Nine Group has adopted a whistleblower policy, which provides for protection to whistleblowers and for the investigation of any disclosures made under that policy. Nine has appointed an external supplier to receive reports made under Nine's whistleblower policy, to provide an independent avenue for concerns to be raised about Nine's treatment of employees or suppliers. This facility is available to Nine's suppliers, as well as employees. Any disclosures received under that policy are investigated by senior staff at Nine and, where appropriate, with the assistance of external advisers. As part of Nine's group wide learning program, all staff were required to confirm that they had read and understood the whistleblower policy.

Any material contracts need sign off from senior management of Nine. This approval process includes consideration of risks relating to a contract, which could include risks relating to the identity or operations of the counterparty.

It is not possible for Nine to fully investigate all activities of its suppliers, as Nine does not have a practical ability to influence the way in which, for example, manufacturers of technical equipment manage their own supply chains. However, if Nine became aware of instances of slavery practices by any of its suppliers, it would promptly seek to address the issue to determine whether it is appropriate for Nine to continue to deal with that supplier.

7. OUR EFFECTIVENESS IN ADDRESSING SLAVERY

Nine has conducted a review of the modern slavery disclosures of the majority of its largest suppliers (noting that not all of them have prepared modern slavery statements) by dollar value as well as those submitted by some of its smaller suppliers in areas such as cleaning which may be considered higher risk. That review encompassed suppliers from Australia and overseas (primarily the US and Europe), and included sports bodies, content production and licensing, technology services, professional services, printing and building services. Those suppliers did not identify any material risks of modern slavery in their business practices. Given those suppliers are typically large organisations, which operate in Australia or other countries with comparable legal systems to protect the rights of individuals, that outcome aligned with Nine's expectations of its business partners.

Another way in which the Nine Group can assess its effectiveness in addressing slavery practices is through the use of its whistleblower policy given it is available to current and former suppliers, as well as employees. There have been no complaints raised through that channel which relate to slavery practices.

While the due diligence processes described above provide a method of managing the risks, Nine will continue to enhance its capability to identify any risk indicators within its supply chain and its capability to investigate and address any concerns. Further to this, Nine will undertake an independent assessment (as part of its Business Assurance program) of the effectiveness of the actions it takes to assess and address modern slavery risks.

The Nine Group will continue to review its approach and improve its processes to respond to the risks of modern slavery.

8. FURTHER STEPS

Nine will continue to review its operations, including the procurement of goods and services, to identify whether there are risks relating to modern slavery in such procurement which Nine can mitigate.

Nine has a number of initiatives, many of which will be completed during FY22, which will improve our ability to monitor and manage risks within our supply chain including:

- Adopting a supplier code of conduct;
- Completion of our Finance Transformation project which consolidates multiple legacy systems providing improved insights and visibility of our supply chain;
- Implementation of a "Supplier Portal" to improve the quality of supplier information and our ability to engage with our suppliers to ensure obligations are understood via agreed terms and conditions;
- Enhancing our procurement and contract management capability;
- Incorporating terms into supply agreements which provide assurance that suppliers are aware of and comply with modern slavery obligations;
- Continuing to regularly review any reporting by Nine's major suppliers of goods and services, to assess whether they are appropriately mitigating modern slavery risk; and
- Undertaking an independent assessment (as part of our Business Assurance program) of the effectiveness of the actions Nine takes to assess and address modern slavery risks.

9. APPROVAL

This statement was approved by the Board of Directors of Nine Entertainment Co. Holdings Limited, as the parent company of the Nine Group, on 10 November 2021.



MIKE SNEESBY

Chief Executive Officer

Nine Entertainment Co. Holdings Limited

10 November 2021

 **Nine**