

Modern Slavery Statement 2019/2020



SBS is committed to playing its part in reducing the risk of modern slavery in goods and services supply chains

1. Introduction

The Special Broadcasting Service Corporation (ABN 91 314 398 574) (**SBS**) was founded on the belief that all Australians, regardless of geography, age, cultural background or language skills, should have access to high quality, independent, culturally-relevant Australian media.

For more than 45 years, SBS's commitment to the communities it was established to serve has been central to all that it does. As the multicultural and diverse fabric of Australia continues to evolve, SBS continues to invest in initiatives, inspired by the SBS Charter, to deepen its connections with communities, and increase respect and understanding within society as a whole, and in doing so contribute to a cohesive society.

SBS's commitment to addressing any modern slavery risks in its operations and supply chain is wholly consistent with the objectives of its Charter. We recognise that our purchasing power can be used to contribute to positive social changes in Australia and globally. SBS welcomes the opportunity to contribute to the eradication of abhorrent modern slavery practices and to share SBS's first Modern Slavery Statement in accordance with clause 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**).

As a multicultural and Indigenous broadcaster for all Australians, SBS aims to set a positive example within the community. For many years, SBS has demonstrated a commitment to ethical sourcing through its existing Indigenous partnerships, which provide opportunities to promote Aboriginal and/or Torres Strait Islander cultures, communities and businesses through the procurement of goods and services from businesses owned by First Nations people. In particular, SBS is a member of Supply Nation, an organisation which facilitates connections between government agencies, corporate Australia and First Nations-owned businesses. As a Supply Nation member, SBS has access to a database of verified First Nations businesses in various industries throughout Australia with whom SBS can engage for services. During the reporting period, SBS continued promoting First Nations businesses, while applying best practice procurement processes when engaging and including First Nations businesses in tenders for general operational equipment. In 2019 the SBS Reconciliation Action Plan (**RAP**) committee also updated its Supply Nation procurement initiatives by encouraging employees to purchase catering, gifts, computer accessories and stationery from accredited First Nations suppliers.

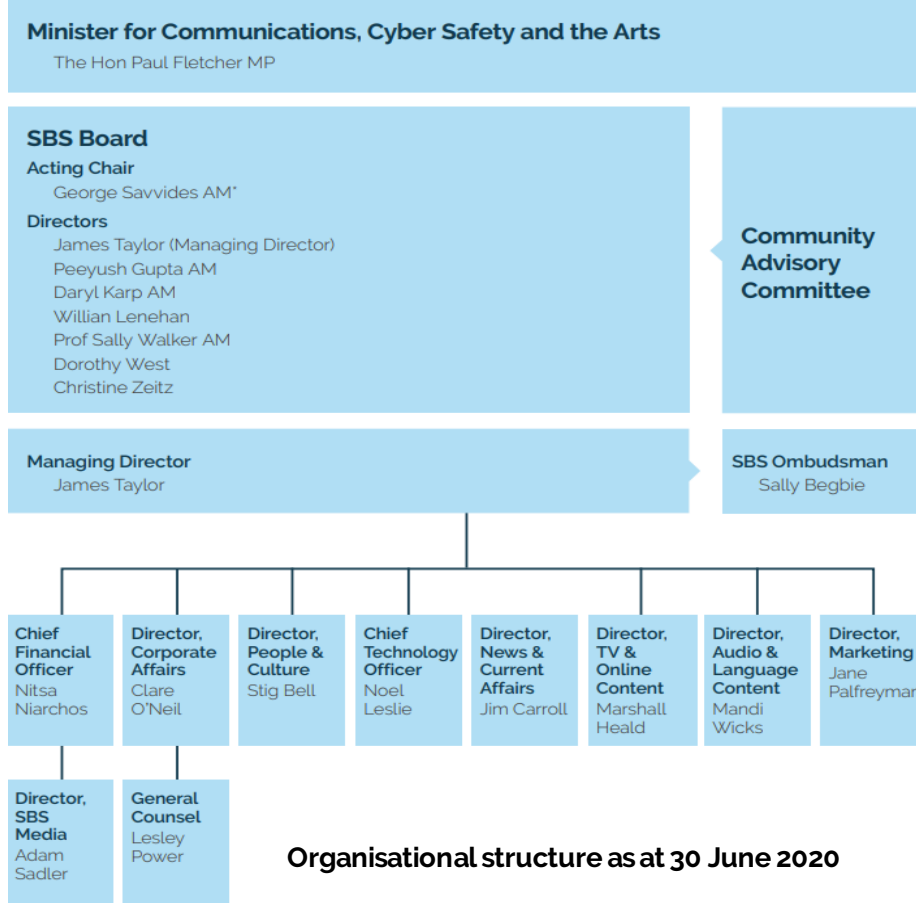


2. SBS's structure, operations and supply chains

Structure

SBS was established as an independent statutory authority on 1 January 1978 under the *Broadcasting Act 1942*. In 1991 the *Special Broadcasting Service Act (SBS Act)* came into effect and SBS became a corporation. Today, SBS is a Corporate Commonwealth Entity for the purposes of the *Public Governance, Performance and Accountability Act 2013* (Cth) and is governed by the SBS Act. SBS has a Board of Directors appointed by the Federal Government, which consists of the Managing Director and non-executive Directors. The SBS Board of Directors is responsible for deciding the objectives, strategies and policies to be followed by SBS in performing its functions. It also ensures that SBS performs in a proper, efficient and economical manner, and with the maximum benefit to the people of Australia. Responsibility for SBS lies within the portfolio of the Minister for Communications, Cyber Safety and the Arts, the Honourable Paul Fletcher MP. SBS does not own or control any other entities. Key platforms and channels of SBS include its five free-to-air television channels in SBS, National Indigenous Television (**NITV**), SBS VICELAND, SBS Food and SBS World Movies; its streaming service, SBS On Demand; and its SBS Radio service in more than 60 languages, which are covered by this Modern Slavery Statement.

SBS's organisational structure comprises 10 'Divisions' that are made up of teams that deliver and support SBS's activities: Television and Online Content (which includes SBS On Demand and NITV), Audio and Language Content (**ALC**), News and Current Affairs (**NACA**, including Sport), SBS Media, Technology, Marketing, Corporate Affairs, Legal, Finance, and People and Culture.



Organisational structure as at 30 June 2020



*George Savvides AM was Acting Chair from 3 June 2020; his substantive appointment as SBS Chair commenced on 9 July 2020. The term of Dr Bulent Hass Dellal AO as SBS Chair expired 2 June 2020.

Operations

The principal function of SBS is to provide multilingual and multicultural broadcasting and digital media services that inform, educate and entertain all Australians, and, in doing so, reflect Australia's multicultural society. Accordingly, the nature and type of core activities undertaken by SBS occur within the media sector. They include:

Division	Core activities
Television & Online Content, NITV, ALC	Production, commissioning and acquisition of audio and audiovisual content
NACA, Sport	Journalism (news and current affairs, investigative and sports reporting) and sports programming
Technology, SBS OnDemand	Radio and television broadcasting operations Technology operations supporting SBS's operational infrastructure and employees Operation of SBS's digital platforms Wardrobe, make-up and hair services for on-air talent
SBS Media	Advertising sales for SBS's radio, television and digital platforms Production of brand funded content Content distribution

SBS employs 1,451 employees in total and has a presence in Sydney, Melbourne Canberra, Brisbane, Perth, Adelaide, Darwin and London. Although SBS's core activities take place largely in Australia, its focus is to deliver services to Australian audiences.

SBS's operations include ancillary activities which support its core activities and its principal function. These include:

Division	Key functions
Corporate Affairs	Government and regulatory relations Advice on SBS Codes and Editorial Guidelines Educational and community outreach Internal and external communications



Ombudsman	Managing SBS Codes complaints
Marketing	Marketing and publicity activities to champion SBS content Audience data and insights research
Corporate Services	Ancillary activities necessary for the day to day operation of SBS offices, including overseeing property, equipment and facilities operation, repairs, maintenance and cleaning, property refurbishment and/or construction, and telecommunication, electricity and internet services
Finance	Budget and financial management of SBS, including procurement
People and Culture	Recruitment, human resources management, payroll, employment relations advice, learning and development
Legal	Legal advice and support
Cross-departmental	Hosting internal and external events

Supply chains

SBS procures a diverse range of goods and services that contribute to SBS's own products and services, either as first tier or indirect suppliers. The main types of goods and services procured by SBS are:

Division	Goods and services procured
Television & Online Content, NITV, ALC, NACA, Sport	Radio and television equipment Pre-production, production and post-production services Commissioned and acquired content On-air talent services Photography Research International stringer services
Technology, SBS OnDemand	Broadcast operations and other major technology and engineering equipment Textiles, make-up, hair products Software
SBS Media	On-air talent services In-language translation and interpreting services
Marketing	Photography services



	Design services Editing services Publicity services
Corporate Services	Electronic and telecommunications equipment Fittings and furnishings Property, equipment and facilities repairs, maintenance and cleaning services Construction materials and services Telecommunication, electricity and internet services
Finance	Financial management software
People and Culture	External recruitment software and services Learning and development software and services
Legal	External legal advice and support Document management services
Cross departmental	Travel Accommodation Office space transport Insurance Bespoke consultant services Hospitality – food and beverages Stationery SBS-branded textiles Event planning, management and organisation Learning and development – conferences, courses and events

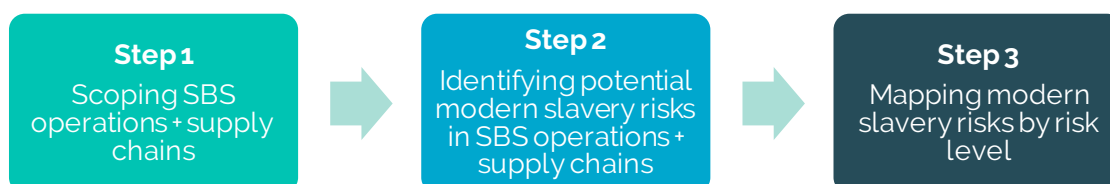
SBS's suppliers, particularly those providing services, are primarily located in Australia, being the country in which SBS focuses its activities. However, the majority of these suppliers source components of their goods or services from overseas. In particular, this includes materials for equipment, software, fittings, furnishings and stationery, ingredients and supplies for hospitality and event planning services, and customer support for telecommunication, electricity, internet and insurance services. Further, acquired (international) audio and audio-visual content, travel, accommodation, office space and transport are regularly sourced by SBS from overseas suppliers in the context of SBS's overseas activities.

SBS has long term arrangements with suppliers for telecommunication, electricity and internet services, and property, equipment and facilities repairs, maintenance and cleaning.



3. Modern slavery risks

During the 2019/20 reporting period, SBS embarked on a comprehensive three-step scoping and mapping exercise to identify and assess its operations and supply chains to examine whether SBS contributes to or is directly linked to any potential modern slavery risks via its operations or supply chains.



Step 1: Scoping SBS operations and supply chains

- As part of this first step, SBS established a modern slavery working group comprising representatives from relevant key divisions of the business, who together reviewed each Division of SBS's operations and supply chains at a generic level, by reference to relevant factors identified in the Government's modern slavery guidance materials.
- This step involved meeting with representatives from identified Divisions within SBS and asking them to complete questionnaires with tailored questions focusing on key risk sectors/industries and geographic locations in their supply chains to further understand any potential modern slavery risks in their Divisions.
- The SBS Finance Division then prepared a detailed report from an internal financial management system which outlined payments made by SBS to goods and/or service providers during the reporting period together with other relevant information about suppliers such as the industry, goods or services provided and location of their operations. This provided more granular data to add to the information already obtained.

The information gathered from the meetings with Division representatives, completed questionnaires and finance report provided an in-depth overview of SBS's operations and supply chains.

Step 2: Identifying potential modern slavery risks in SBS operations and supply chains

- The second step involved assessing the information gathered in step one, and identifying suppliers deemed to present a potential modern slavery risk based on the key risk factors outlined in the Government's guidance materials and other industry guidance. This included taking a risk-based approach to focus on geographic risk, service or product risk, industry or sector risk and specific entity risks.



- SBS identified 44 suppliers that posed a potential modern slavery risk within SBS's supply chains based on risks associated with their geographic location, service or product provided, industry or sector or any known entity risks. SBS then undertook further due diligence on those suppliers to better understand their practices, including reviewing the suppliers' published materials for any relevant information on their modern slavery or ethical sourcing policies (including existing modern slavery statements from other jurisdictions where available).

Step 3: Mapping modern slavery risks by risk level

- The third step was to finalise a heat map based on the information gathered in steps one and two. This involved assigning an overall internal potential modern slavery risk rating to the suppliers based on all the information available. In total, of the 44 suppliers assessed, SBS identified 24 as carrying medium-high or high modern slavery risk, the remaining suppliers were deemed low risk in accordance with the above criteria.
- The suppliers allocated an overall modern slavery risk of either medium-high or high risk were identified as being high risk in one or more of the geographic, service or product, industry or sector or entity risk categories. SBS identified the higher risk contracts in its supply chain as being for services or products that included **software, shipping, catering, electronics, stationery, cleaning and janitorial services and technology**. Within this group of high or medium-high risk suppliers:
 - Most of SBS's large suppliers already had robust modern slavery statements and ethical sourcing policies in place as a result of their overseas legal obligations or in anticipation of their obligations under the Act, which comprehensively addressed their modern slavery mitigation practices.
 - Other large SBS suppliers had publicly foreshadowed providing their first Australian modern slavery statement under the Act.
 - For the remaining smaller suppliers, SBS began seeking responses directly from them to gauge their modern slavery awareness and seek further visibility of their supply chains, including where and how they source their own products or ingredients, who are their key suppliers, how and on what basis they engage their workers and what due diligence activities they have conducted.

Further due diligence and engagement with these suppliers will occur in the 2020/21 reporting period, as outlined below.

4. SBS's response to modern slavery

In our first reporting period, SBS undertook a range of overarching business actions and due diligence steps to review, assess and address any modern slavery risks potentially contributed to or directly linked to our operations and supply chains, such as:



- **Establishing a modern slavery working group:** Representatives from Legal, People & Culture, TV & Online Content, Finance, Technology, Corporate Affairs, Audio & Language Content, Corporate Services and News & Current Affairs were nominated by their Division directors to be part of the modern slavery working group, led by Legal. This group met during the reporting period to discuss Division-based risks, and to review progress and deliverables.
- **Collaborating with external advisors and industry colleagues:** SBS engaged external legal assistance to provide best practice advice and guidance on our obligations under the Act, and on our proposed approach to addressing modern slavery risks within our operations and supply chains. Members of the modern slavery working group also met with colleagues within the media industry to share ideas and learnings specific to the media industry and participated in external learning opportunities to help ensure a best practice approach to the Act.
- **Scoping and assessing SBS's operations and supply chains and conducting due diligence:** The modern slavery working group reviewed SBS's operations and supply chains to ascertain any modern slavery risks. SBS then conducted further due diligence on each supplier deemed to carry a higher risk, particularly those from high geographic risk locations or high-risk sectors/industries. This involved individual follow up with those suppliers and review of their modern slavery statements (if applicable), ethical sourcing policies and their individual responses to SBS's bespoke queries.
- **Updated template contracts:** New tailored modern slavery clauses have been incorporated in key SBS contract templates with contractors and Request for Proposal (RFP) documents, which means that compliance with the Act is now part of SBS's tender process. The new template clause now requires suppliers to, for example, cooperate with SBS due diligence enquires/audits regarding modern slavery, and to have in place adequate policies, procedures and training to prevent, detect, manage and remedy modern slavery risks in their operations and supply chains. These updated templates have been circulated to staff who procure goods or services on behalf of SBS and are also available to all staff on SBS's dedicated modern slavery intranet page. This approach aims to help ensure that modern slavery requirements will be accounted for in all new supplier engagements.
- **Training:** SBS has updated its contractor management training materials to include new information about modern slavery to ensure staff who engage contractors understand modern slavery requirements and can respond to queries from suppliers about modern slavery and SBS's expectations regarding supplier compliance. While COVID-19 has delayed SBS plans to roll out this training face to face during the 2019/20 reporting period, SBS intends to pivot to online contractor management training during the 2020/21 reporting period.
- **Communications to SBS staff:** Key information about the Act and SBS's modern slavery response has been communicated to SBS staff including to all staff via the internal SBS newsletter 'Inside SBS' communicated by SBS's Managing Director. In addition, targeted emails to staff who procure



goods and services on behalf of SBS were sent along with updated contractor templates. Apart from raising awareness of modern slavery, this approach is designed to ensure that those staff who engage suppliers have modern slavery obligations front of mind when liaising with suppliers.

- **Dedicated modern slavery intranet portal:** A dedicated modern slavery online portal has been created to provide key resources and information to staff on modern slavery laws and obligations. This page includes information about modern slavery, relevant modern slavery news and current affairs related content produced by SBS, links to updated contracts for engagement of suppliers containing modern slavery clauses, relevant external links to further modern slavery resources, contact details for internal contacts and links to report allegations of modern slavery to SBS's whistleblowing service.
- **Whistleblowing hotline:** SBS's contracted independent whistleblowing service enables staff to report any allegations of modern slavery in SBS's supply chains safely and securely via an independent whistleblowing platform. Information on the hotline, including contact details, are available on the modern slavery intranet portal.

5. Effectiveness of actions

The effectiveness of actions taken to address modern slavery risks is difficult to quantify. However, SBS recognises that a continuous improvement approach necessarily entails mechanisms through which to review, assess and measure the effectiveness of actions taken. To that end, SBS will undertake the following actions in the 2020/21 reporting period to assess how effective and impactful our 2019/20 actions have been.

These include:

- **Reporting on the number of employees who completed training on modern slavery as part of their contractor engagement training.** The working group will set a KPI of ensuring that all employees whose roles involve procuring goods and services on behalf of SBS have completed training by the end of reporting period 2020/21.
- **Surveying those employees whose roles involve procuring goods and services on behalf of SBS.** An online survey of staff will be carried out in reporting period 2020/21 to measure staff awareness of the Act, and SBS's modern slavery approach and to gain qualitative data about responses from suppliers on modern slavery requirements during the contractor engagement period.
- **Reviewing effectiveness of actions annually.** In addition to regular working group meetings, SBS's working group will also meet annually for a dedicated review session to assess actions undertaken and recommend ways to improve SBS's approach to the Act.



6. Impact of COVID-19

SBS acknowledges the real impacts of COVID-19 on operations and supply chains globally and the additional risks this presents to vulnerable workers worldwide. In accordance with Government guidance, in reporting period 2020/21, SBS will seek to understand the impacts of COVID-19 on workers within its deeper supply chain by adding COVID-19 to its scoping review, to ascertain any steps SBS can take to mitigate against the heightened modern slavery risks posed by COVID-19.

In terms of impacts of COVID-19 on SBS's modern slavery response during the 2019/20 reporting period, key impacts included delayed face to face training roll out. While training materials were completed during the reporting period, the roll-out will occur online in the 2020/21 reporting period. In addition, impacts of COVID-19 included less engagement from time-pressed suppliers which made conducting due diligence more difficult. These issues are areas that can be addressed in the 2020/21 reporting period.

7. Future roadmap: 2020/21 reporting period

Building on the solid foundations implemented in the 2019/20 reporting period, SBS's working group for the 2020/21 reporting period will take a continuous improvement approach to its modern slavery obligations with a focus on:

- further due diligence regarding potentially medium-high and high risk suppliers as identified in the 2019/20 reporting period;
- scoping of new suppliers as well as a review of suppliers from the 2019/20 reporting period to ensure continuous improvement of supply chain knowledge, and inclusion of COVID-19 impacts in scoping exercise;
- further assessment of key risk areas including geographic risks from additional overseas suppliers and a greater focus on industry/sector risks such as hair and make-up products and merchandise (such as clothing, accessories and decorations);
- greater focus on regular engagement with industry stakeholders to share learnings post 2019/20 reporting period;
- increasing staff awareness and knowledge of modern slavery via delivery of contractor engagement and management training, focused staff communications and driving staff engagement with the modern slavery intranet portal; and
- implementing actions outlined above to measure effectiveness of SBS's response and implement improvements



Approval

This Modern Slavery Statement was approved by the SBS Board of Directors at their meeting on 25 February 2021.

A handwritten signature in blue ink, reading "James Taylor", located below the approval text.

James Taylor
Managing Director
Date: 25.03.2021