



# Modern Slavery Statement 2024



**Nine Entertainment Co.**

ABN 60 122 203 892

[nineentertainment.com.au](http://nineentertainment.com.au)

# Message from the Acting CEO

*Nine shapes culture by sparking conversations, challenging perspectives, informing and entertaining our communities. We bring people together by celebrating the big occasions and connecting the everyday moments. Australia Belongs Here.*

Our purpose means we are committed to reducing the risk of modern slavery in our operations and supply chain. We engage with a wide range of third-party suppliers nationally and, to a lesser extent, globally, who primarily deliver to Nine content or services related to our distribution of content.

Our FY24 Modern Slavery Statement shows how we are meeting this commitment.

**Matt Stanton**  
Acting CEO



# Modern Slavery Statement 2024

## 1 Introduction

This is the Modern Slavery Statement (**Statement**) issued by Nine Entertainment Co. Holdings Limited ACN 122 203 892 (**Nine**), as the reporting entity under the Modern Slavery Act 2018 (Cth) (the **Act**) for the year to 30 June 2024. 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 subsidiaries (**Domain**)<sup>1</sup>.

For the purposes of this Statement, all of the assets of the Nine Group are treated as those of the group and, for clarity, all the entities which comprise the Nine Group, other than Domain and its subsidiaries, are covered by this Statement.

The purpose of this Statement is to assess, address and demonstrate Nine's responsibility under the Act and more importantly, to assist in the promotion of human rights. Whilst confident its business operations and supply chain do not pose a high risk of exposure or opportunities for modern slavery; Nine recognises its responsibility within its supply chain and is constantly seeking to enhance its corporate contribution.

### Nine's commitment to human rights

Nine is committed to respecting and upholding the human rights of our people and any other individuals we are in contact with. We acknowledge that our commitment to human rights will support our future success as a responsible business.

Nine recognises that it is a part of the communities in which it operates, where it produces the content, or where its people, suppliers and partners live and work. Nine's commitment has been demonstrated through its Nine Cares activities.

Nine knows that in order to succeed, we must commit to upholding respect for human rights and that includes ensuring modern slavery risks are identified and, where possible, addressed.

At Nine, our approach to human rights is guided by international frameworks and standards. We have modelled Nine's policies upon best practice in our industry. Nine's commitment is reflected in the following policies (which can be found at [nineforbrands.com.au/corporate-governance-2](https://nineforbrands.com.au/corporate-governance-2)):

- Code of Conduct
- Diversity Policy
- Whistleblower Policy (which also provides an avenue for suppliers to raise issues with Nine)
- Supplier Code of Conduct

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

## 2. Nine's structure, operations and supply chain

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 includes the following wholly owned subsidiaries:

- Nine Network Australia Pty Ltd (ACN 008 685 407) which is responsible for its television operations, which operate as part of the 9Network. This comprises its television channels 9, 9HD, 9Go!, 9GEM, 9Life and 9RUSH;
- Nine Digital Pty Ltd (ACN 077 753 461) which operates Nine's Broadcast Video on Demand service 9Now and digital properties such as nine.com.au;
- Fairfax Media Publications Pty Ltd (ACN 003 357 720) which, directly or through other subsidiaries, publishes the major mastheads *Australian Financial Review*, *The Sydney Morning Herald* and *The Age*;
- Nine Radio Pty Ltd (ACN 063 906 927) which operates its radio operations including its radio channels 2GB, 3AW, 4BC and 6PR;
- Stan Entertainment Pty Ltd (ACN 168 856 924) which operates the subscription video platform Stan;
- Pedestrian Group Pty Ltd (ACN 112 839 568) which operates youth-orientated digital properties including pedestrian.tv; and,
- Caradvice.com Pty Ltd (ACN 116 608 158) which operates drive.com.au, a digital publisher.

The Nine Group also includes a majority investment in Domain. Domain is not included as part of this Statement. Domain's Modern Slavery Statement can be found at: [domain.com.au/group/esg/governance](https://domain.com.au/group/esg/governance).

More information about Nine can be found in our most recent [Annual Report](#).

### Our operations

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 broadcast 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 & Audio, 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 5,000 employees, the majority of whom are based in Australia.

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 2024 was \$2.6 billion.



## Our supply chains

Our supply chains involving our direct (**tier 1**) suppliers can be broadly grouped as content, goods/equipment and services. Nine Group:

### Content

- acquires licensed and commissioned content from an array of suppliers including major studios and distributors, production companies and independent content houses;
- engages freelance writers, performers and contributors who contribute to Nine's audio-visual, digital and published content;
- acquires content rights from Australian and international sporting bodies;
- licenses content such as photographs from various licensing agencies and other media companies;
- acquires advertising (where Nine is advertising its products and services on platforms outside the Nine Group) and production of advertising content;

### Goods and equipment

- acquires goods ranging from specialist broadcast technical equipment and bulk paper supplies for printing to standard office equipment and cars to clothing, merchandise used for promotional purposes and props for television programs;

### Services

- acquires technology and communications services on standard commercial terms; and other specialised services such as professional or broadcast services and non-core, repeatable services, such as some finance operations; and
- acquires other services such as printing, delivery of newspapers, specialist services such as camera operators at outdoor sporting events, building management, security and contract cleaning; from a range of specialist suppliers and from labour hire businesses as appropriate.

Nine's suppliers are located in over 46 countries around the world, but, by value of expenditure, are predominantly located in Australia, USA, United Kingdom, Ireland and the Netherlands which represents more than 98% of Nine's expenditure. These countries are all rated low for prevalence of modern slavery practices on the last available Global Slavery Index<sup>2</sup>.

## 3. Nine's risks of modern slavery practices

Nine considers that the nature and location of its operations across the Nine Group 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. Nonetheless, Nine remains committed to taking steps to identify and address potential incidents of modern slavery within the Nine Group or our supply chains.

### Risk of modern slavery in our operations

Nine's direct workforce primarily consists of highly skilled professionals, based mainly in office facilities, creating and delivering products (such as newspapers and events) or services (such as sports, entertainment, current affairs and news television programs, and digital publications).

Our employees are predominantly permanent employees who are employed in accordance with local labour laws and paid fairly at market rates. Nine has appropriate workplace 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. Consequently, the risk that Nine causes or contributes to modern slavery in its operations are low. There are isolated examples of operations in jurisdictions where labour exploitation risks are higher. To minimise risks associated with overseas workers, Nine ensures its workers are engaged on Australian terms, recognising Australian labour laws and entitlements.

Nine recognises that children account for 12 per cent of all those in forced labour<sup>3</sup>. While Nine does not regularly work with children, Nine is committed to the protection of 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.

2. [globalslaveryindex.org](https://www.globalslaveryindex.org)

3. [ilo.org/wcmsp5/groups/public/---ed\\_norm/---ipecc/documents/publication/wcms\\_854733.pdf](https://ilo.org/wcmsp5/groups/public/---ed_norm/---ipecc/documents/publication/wcms_854733.pdf)

## Risk of modern slavery in our supply chains

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 commensurate 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. The majority of Nine's annual spend with suppliers occurs within Australia.

While we have some isolated instances of suppliers operating in countries where modern slavery risk is higher, we have put in place measures to monitor the nature of these activities to ensure the risk of slavery is managed. This includes working with known or substantial entities or obtaining advice to ensure that they are being engaged appropriately.

### Services Suppliers

A large majority of Nine's spend with third party suppliers is on content production services. Where Nine has contracted with a third party to produce broadcast 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. One area for particular focus in this respect is the way in which participants in broadcast programming are cared for and managed, both during and after filming of a program occurs. This gives Nine confidence in this part of its supply chain.

Where Nine acquires other ancillary 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.

### Product Suppliers

Nine is particularly cognisant of its modern slavery risks relating to its direct suppliers in the key areas of raw products and technology software/hardware which have a heightened risk of modern slavery practices. These are mostly industry-wide risks which reflect the origin of goods from countries with a higher prevalence of modern slavery, and Nine's ability to influence suppliers in this area is limited.

A key raw product that Nine acquires for its Publishing business is paper. Where Nine acquires goods such as newsprint paper (which is an area that is identified as being at risk of modern slavery practices in areas such as deceptive recruitment or forced labour), this is done through reputable suppliers whose operations are in the local Australian and/or New Zealand markets. Nine has reviewed its newsprint paper major suppliers' assessments of their own modern slavery risks and, in this regard, consider that the risk is low with those suppliers.

Other major categories of products purchased across the Nine Group include printing and ink, media/broadcast equipment and technology, including typical workplace software and hardware. Nine recognises that the Information and Communications Technology (ICT) sector poses some level of risk of forced labour in certain regions. There is some inherent risk that our procurement of ICT hardware is linked to modern slavery practices, most prevalent in the raw material extraction, manufacturing and disposal stages. Nine has reviewed its suppliers' own modern slavery statements and is reasonably satisfied its suppliers mitigate the inherent risk with auditing its supply chain, through implementing prevention processes, and where those suppliers have identified non-conformance, effective remediation procedures and actions.

### Extended Supply Chain for Products and Services

Nine is aware that some of its indirect suppliers are based in certain sectors that are recognised as having higher modern slavery risk. Included in those are forestries (paper suppliers), information technology hardware (electronic equipment, instruments and components); and third party labour hire (which Nine may not have visibility over).

Notwithstanding the above, we continue to review our supply chains, enhancing our capability to identify modern slavery risks and improving our supplier due diligence, onboarding and compliance monitoring processes as noted further in this statement.

## 4. Due diligence processes for modern slavery

Nine recognises the complexity of modern slavery, and the variety of ways in which it can manifest in operations and supply chains. There are a number of policies, processes and practices across Nine which minimise the risk of Nine contributing to modern slavery practices. This includes our Code of Conduct and other relevant policies.

### Nine's code of conduct

Nine's Code of Conduct (**COC**) sets out the ethical conduct required of directors, officers and employees, and expected of anyone working on behalf of the Nine Group, including contributors, consultants, agents, contractors and subcontractors.

Our COC promotes lawful and ethical business practices and policies to protect, as far as it is able, workers from being abused or exploited, either within Nine itself or within its global supply chains and asks employees to speak up if they have any concerns about compliance with the COC.

### Other policies

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. Other relevant policies include Nine's Occupational Health and Safety Policy, Diversity Policy and Workplace Harassment, Discrimination and Bullying Policy, which are designed to ensure that Nine's business is conducted in accordance with ethical and responsible business practices to reduce the risks of modern slavery practices arising.

Nine consults with senior management of the key business units in the Nine Group, in particular those set out in item 2 of this Statement to increase the awareness of modern slavery risks and in the design of additional measures to the risk in our operations and supply chains.

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.

### Supplier code of conduct and procurement policies and processes

Nine has published a Supplier Code of Conduct (**Supplier CoC**) that sets out the minimum standards that the Nine Group expects of its suppliers. Nine's approach to third party risk management covers a broad range of risk domains, including modern slavery. Nine expects its suppliers to comply with social, environmental and ethical standards of behaviour, comply with legislation and meet the required standards of the International Labour Organisation (**ILO**) and the Australian Human Rights Commission.

The Supplier CoC applies to all entities that supply goods or services to Nine. Nine expects all of its suppliers to ensure:

- that they comply with the Supplier CoC;
- that their own supply chain complies with Nine's Supplier CoC; and,
- that suitable management systems and processes are implemented to ensure and measure compliance with the Supplier CoC.

Nine is in the process of embedding compliance with the Supplier CoC. Under the Supplier CoC, Nine's suppliers are expected to engage in appropriate work practices including:

- not engaging in or tolerating the use of any forced, bonded, or compulsory labour, slavery or human trafficking;
- complying with international and local obligations relating to the employment of children, including adhering to the minimum legal working age in their jurisdiction or the standards set by the ILO; and
- providing fair working conditions for their employees.

Any personnel that becomes aware of any contravention of the Supplier CoC is encouraged to escalate any concern to a dedicated hotline. In addition, the Nine's Supplier CoC states that compliance can be checked at any time.

### Reviewing our suppliers

Nine conducts an annual 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. The review encompasses suppliers from Australia and overseas (primarily the US and Europe), and includes sporting bodies, content production and licensing, technology services, professional services, printing and building services. This provides Nine with greater transparency over its supply chain.

A review of supplier practices may occur at different points during the period of Nine's relationship with that supplier. Reviews may occur through due diligence, at the point of contracting or renewal, or in some cases, more frequently.

## Remediation

In FY24, Nine has not identified that it has caused or contributed to adverse modern slavery outcomes. Nine continues to encourage employees and third parties to raise any concerns about modern slavery through Nine's 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. Any disclosures received under that policy are investigated by senior staff at Nine and, where appropriate, with the assistance of external advisers. Nine's staff are required to confirm that they have read and understood the whistleblower policy.

Any material contracts require 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, and confirmation of whether the contract includes a requirement relating to notification of modern slavery issues.

Nine requires new supplier contracts to incorporate clauses to address modern slavery risks and require compliance with modern slavery legislation. We appreciate the importance of ensuring compliance within our operations and within our supply chain.

While we acknowledge that it may not be possible for Nine to fully investigate all activities of its suppliers, and in turn, their suppliers, we continue to look for ways to support the promotion of human rights within our operations and our sphere of influence. 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.

## 5. Our effectiveness in addressing slavery

Nine's most recent review of its largest suppliers' modern slavery disclosures 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 continually assesses 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 modern slavery practices.

The due diligence processes described above provide a method of managing the risks however we will continue to enhance our capability to identify any risk indicators within our supply chain and our capability to investigate and address any concerns.

During FY24, Nine has:

- adopted a supplier code of conduct which is published and will continue to be rolled out to suppliers over FY25;
- created a communications channel for employee queries regarding Nine's Code of Conduct and procurement processes;
- adopted and published a supplier and procurement policy to ensure Nine has sound processes and principles in place across its procurement and supply chain to identify and mitigate risks of modern slavery;
- continued to include standard clauses addressing modern slavery risks in supplier contracts;
- created a communications and education plan for employees who are involved in procurement processes to create awareness of modern slavery and its associated risks within Nine's supply chain;
- implemented stronger supplier selection onboarding processes including the introduction of a supplier questionnaire requiring vendors who meet a monetary threshold confirm they have their own modern slavery statement and risk management processes within their operations or supply chains; and
- set up media monitoring relating to modern slavery.

The Nine Group will continue to review our approach and continuously improve our processes to respond to the risks of modern slavery. In FY24, Nine has not received any complaints of any modern slavery issues or notifications from its suppliers of identification of modern slavery practices.



## 6. Consultation process

Nine consulted with its owned or controlled entities (excluding Domain) in the development of this Statement. Nine’s annual review of modern slavery practices included suppliers from each of the Nine Group members.

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 from entities owned or controlled by Nine to prepare this statement on behalf of the Nine Group.

## 7. Additional information

### Mandatory reporting criteria

The following table provides reference to where within this statement we have addressed the mandatory criteria of the Act.

Mandatory reporting criteria	Where we do this
Identify the reporting entity	Section 1
Describe the reporting entity’s structure, operations and supply chains	Section 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity it owns or controls	Section 3
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 4
Describe how the reporting entity assesses the effectiveness of these actions	Section 5
Describe the process of consultation with any entities that the reporting entity owns or controls	Section 6
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Sections 8



## 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 had commenced a number of initiatives and will continue to work on them to ensure we can continue to improve our ability to monitor and manage risks within our supply chain including:

- roll-out the supplier code of conduct to new and existing suppliers;
- continued enhancement of our procurement and contract management capability;
- rolling out requirements for third party suppliers to report whether they have a modern slavery statement and a process for further assessment if they report that they do not;
- continued training where necessary on modern slavery for the business; and,
- monitoring the federal government's review of the Act and reviewing Nine's policies and processes taking into account the outcome of the review.

We will also continue to:

- incorporate terms into supply agreements which provide assurance that suppliers are aware of and comply with modern slavery obligations;
- regularly review any reporting by Nine's major suppliers of goods and services, to assess whether they are appropriately mitigating modern slavery risk;
- conduct risk assessments of suppliers to better identify risk and strengthen our supplier engagement around modern slavery; and
- identify ways to raise awareness and promote our grievance mechanisms for relevant stakeholders to raise concerns.

## 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 26 September 2024. This statement is signed by Catherine West, as Chair of Nine Entertainment Co. Holdings Limited on the date shown below.



**Catherine West**

Chair

26 September 2024