



Modern Slavery Policy

1. INTRODUCTION

Prime Media Group is publicly listed on the Australian Securities Exchange (**ASX**) and is the parent company of a regional television broadcasting business which operates in Australia and has supply chains extending to overseas. Prime Media Group and its subsidiaries (**Prime Media**) value human rights and are committed to ensuring that all business is conducted in accordance with ethical, professional and legal standards.

The *Modern Slavery Act 2018* (Cth) (the **Act**) aims to prevent modern slavery within Australian entities, and requires Prime Media to disclose how its business operations and supply chains may contribute to modern slavery and outline how those risks are being addressed.

Prime Media's Modern Slavery Policy (**Policy**) forms part of the risk management framework. The purpose of the Policy is to articulate Prime Media's commitment to prevent breaches of the Act within its operational and supply chains.

2. WHO THE POLICY APPLIES TO

This Policy applies to all directors (executive and non-executive) and employees of Prime Media (**Prime Media personnel**), and to any third-party acting on its behalf and any other person notified that this Policy applies to them.

Prime Media expects all who have, or seek to have, a business relationship with Prime Media to familiarise themselves with this Policy and to act in a way that is consistent its values. For these purposes, a "third-party" may include distributors, suppliers, purchasers or contractors.

3. WHAT IS MODERN SLAVERY

Modern slavery is a violation of fundamental human rights. It can take many forms, including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

4. PRIME MEDIA'S OBJECTIVE

Prime Media is firmly opposed to all forms of modern slavery and is committed to implementing and enforcing effective systems and controls to counter modern slavery occurring within its business and infiltrating its operational and supply chains.

The board of directors of Prime Media (**Board**) has developed the following measures which are designed to prevent and detect modern slavery within its business operations and supply chains:

- a policy that articulates Prime Media's commitment to prevent breaches of the Act within its operational and supply chains, being this Policy;
- communication of this Policy to employees of Prime Media, and to Prime Media's business suppliers;
- the assessment of modern slavery risks within Prime Media and its supply chains, and the development of effective and transparent controls to reduce exposure to those risks;
- the adoption of anti-modern slavery wording in new and renewal contracts with existing and future business suppliers; and

- the adoption of appropriate due diligence on business suppliers; and
- training of Prime Media personnel so that individuals can recognise modern slavery practices and take steps to avoid the same.

Prime Media is also committed to ensuring there is transparency in its own business and in its approach to eliminating modern slavery from its business operations and supply chain. To that end, Prime Media will endeavour to provide safe and fair working conditions for its employees. Prime Media expects the same standards from its business suppliers.

Prime Media has conducted initial risk assessments to determine which parts of its business operations and its supply chains are most at risk from modern slavery so efforts can be focused on the areas that are deemed to be most 'at risk'. As part of these risk assessments, Prime Media has identified the following:

- computer hardware, broadcasting and transmission equipment, media production technology and day-to-day business products sourced from overseas; and
- contracts for labour services such as cleaning and gardening services.

5. MODERN SLAVERY STATEMENT

Prime Media is mindful of its disclosure obligations under the Act, and the Board commits to publishing an annual Modern Slavery Statement (**Statement**). The annual Statement will describe the risks of modern slavery in the operations and supply chains of Prime Media, and outline the steps it has taken during that particular financial year to ensure that modern slavery is not taking place within its business operations or in any of its supply chains.

Prime Media's first Statement will be published no later than 31 March 2021.

6. COMPLIANCE WITH THE POLICY

Anyone working in any capacity on behalf of Prime Media, including directors, executives and employees, business suppliers and third-party representatives, are required to read, understand and comply with this Policy.

Prime Media personnel will, where possible, prevent, detect and report modern slavery if it is encountered in any part of Prime Media's business operations and supply chains. Those working on behalf of Prime Media are required to avoid any activity that might lead to, or suggest a breach of this Policy.

7. REPORTING

If anyone becomes aware of, or suspects that modern slavery is taking place or may occur in the future, they must notify their manager, a member of the Board or the Legal Department as soon as possible. This applies whether or not the suspected modern slavery involves Prime Media or one of its business suppliers. Employees are encouraged to raise concerns about any modern slavery occurring in any part of Prime Media's business operations or its supply chains at the earliest possible stage.

If any employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within Prime Media's supply chains constitutes any of the various forms of modern slavery it should be raised with their manager, a member of the Board or the Legal Department.

Prime Media encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. A person will not experience retribution or retaliation for a complaint made in good faith.

If any person suffers detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place, they should inform the Legal Department. Detrimental

treatment includes dismissal, disciplinary action, or other unfavourable treatment connected with raising a concern.

8. COMMUNICATION AND AWARENESS

This Policy will be made available to view and download at www.primemedia.com.au and Prime's Intranet to raise awareness.

Employees will be provided a copy of this Policy upon commencing employment with Prime Media.

Employees (to the extent applicable to their roles) will also be required to undertake training on this Policy, as part of their induction and annual work health safety training and other applicable training processes. Training will include the provision of information on warning signs that might indicate modern slavery is taking place in Prime Media's business operations and supply chains.

Prime Media's commitment to eradicate modern slavery from its business operations and supply chains will be communicated to business suppliers at the outset of its business relationship with them and when renewing contractual arrangements.

This Policy will also be reflected in new contractual arrangements with Prime Media's suppliers, and Prime Media will undertake due diligence when vetting new suppliers, in addition to annually reviewing its existing suppliers.

9. BREACHES

Any employee who breaches this Policy will face disciplinary action. Serious breaches may be regarded as gross misconduct which could result in immediate dismissal.

Prime Media may terminate its relationship with other individuals and third parties working on its behalf if they breach this Policy.

10. KEY CONTACTS

If any part of this Policy is unclear please contact any member of the Board or the Legal Department.

11. REVIEW

The Board will review this Policy at least every two (2) years and will, if necessary or desirable, amend the Policy.

Last revised July 2020