



**Network Ten**  

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**Modern Slavery  
Statement 2020**



# Network Ten Pty Limited Modern Slavery Statement 2020

## 1. Reporting Entity

This statement is made under the *Modern Slavery Act 2018 (Cth)* by Network Ten Pty Limited ABN 91 052 515 250 (**TEN**). It records TEN's stance against all forms of modern slavery. The statement sets out the risks of modern slavery in TEN's supply chains and the steps taken to address those risks during the financial year ended 31 December 2020.

## 2. TEN's Structure, Operations and Supply Chains

TEN is a wholly-owned, indirect subsidiary of ViacomCBS Inc (**ViacomCBS**), a global media and entertainment company that creates content and experiences for audiences worldwide.

TEN's headquarters are in Sydney with operations also based in Melbourne, Brisbane, Adelaide, Perth and Canberra.

TEN is a free-to-air commercial television broadcaster and has four free-to-air channels, 10, 10 Bold, 10 Peach and 10 Shake and a video on demand service, 10 Play, which includes our podcast platform, 10 Speaks.

Key activities of TEN's operations include the production and distribution of content across multiple platforms, the acquisition of content produced by third parties and the sale of advertising inventory and sponsorships.

TEN delivers a variety of content across multiple platforms and is home to popular franchises including *MasterChef Australia*, *Australian Survivor*, *I'm A Celebrity... Get Me Out Of Here!*, *The Bachelor Australia*, *Have You Been Paying Attention?*, *The Living Room*, *Gogglebox Australia*, *10 News First* and *The Project*.

TEN is also a member of several industry groups, including FreeTV, Think TV and Freeview Australia.

TEN's principal supply chains relate to supplies of:

- Media and entertainment content for television, digital and audio (podcast) such as production companies and distributors, both Australian and international;
- Information technology products and services for content storage and distribution, transmission services, broadcasting equipment, IT and support services;
- Goods and services for day-to-day business operations including office supplies, travel, cleaning and maintenance, and professional services (such as legal, tax and audit); and
- Goods and services for marketing, advertising, and promotional activities.



### **3. Slavery risks in operations and supply chains**

TEN is aware of the need to consider and address the risk of modern slavery which may arise in its supply chains.

TEN's core business is in the production, acquisition and distribution of media content. Our business, and that of most of our suppliers, operates in areas where roles are largely performed by technical and/or professional operators. As a result, the risk of modern slavery is low.

TEN is not aware of, nor does it have any information to suggest that, any inappropriate labour conditions are currently present in our supply chains.

### **4. Actions to assess and address modern slavery risks**

#### **4.1 The Global Business Practice Statement and the Supplier Code of Conduct**

ViacomCBS applies universal standards when dealing with suppliers around the world including by way of the ViacomCBS code of conduct contained in the [Global Business Practices Statement](#) (GBPS). In 2020, TEN's employees were included in the ViacomCBS online training program concerning the code of conduct.

The GBPS serves as an expression of ViacomCBS' commitment to acting ethically and in accordance with the laws that apply wherever business is conducted. It is also intended to be a practical internal resource on ethics and legal compliance matters, providing information and guidance to help us always do the right thing. The GBPS includes the [Supplier Compliance Policy](#).

Under the provisions of the Supplier Compliance Policy, our suppliers must adhere to the same high standards that ViacomCBS sets for itself in relation to fair and ethical business and employment practices including in relation to child and forced labour, wages, hours, overtime, improper behaviour in the work place and any work-related settings.

To enhance the integration of global policies to local practices, TEN has mapped the internal structure of the business and identified and briefed key members of each business area on the risk of modern slavery and our regulatory obligations. Departmental managers have been provided with a review template to list all material suppliers and assess the modern slavery risks based on a number of key indicators. A review of those survey results aligns with the view above that there is limited risk of modern slavery in TEN's supply chains.

#### **4.2 Grievances**

TEN has clear paths for employees to raise grievances, including concerns regarding modern slavery. Our Speaking Up & Non-Retaliation Policy clarifies the universal expectation of employees to speak up and raise concerns if they see behaviour which they feel is at odds with the guidance from the GBPS.



Employees are encouraged to use OpenLine, the ViacomCBS reporting helpline in situations where employees believe their report should be directly communicated to ViacomCBS' Office of Global Compliance or where they prefer to place an anonymous report in confidence.

Further, the ViacomCBS ANZ Whistleblower Protection Policy sets out what whistleblowing is and the steps that can be taken to raise a concern. Disclosable matters under the policy include where there is a suspected improper state of affairs, including in relation to breach of the law.

## 5. Assessing the effectiveness of our actions

TEN has taken first steps to assess and manage exposure to modern slavery and plans are in development to build upon these measures and assess their effectiveness. This includes building awareness of modern slavery within the business and with our suppliers and also identifying where communications can be improved and expanded.

TEN intends to review its policies, training, and risk assessment procedures annually to determine their effectiveness. This includes consideration of any further guidance or advice provided by the Department of Home Affairs following its assessment of modern slavery statements as well as review of published statements by our suppliers and other reporting entities in the media sector.

The change of management of TEN that occurred following the merger of Viacom and CBS in late 2019 and the impact of COVID-19 have delayed our plans to conduct a targeted supplier survey by way of questionnaire and further raise employee awareness of the potential exposure to modern slavery. In the future, we hope to engage with employees and suppliers on the challenges and nuances of modern slavery by way of employee training and a targeted supplier survey.

## 6. Consultation

This statement was prepared with the assistance of TEN's Legal, Finance, Regulatory, Programming, Sales, Operations and Digital departments. TEN hopes to be able to further the work we have done to investigate current supply chains for the purpose of future reporting.

This statement has been endorsed by the Board of Network Ten Pty Limited.

**Beverley McGarvey**

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Chief Content Officer & EVP,  
ViacomCBS ANZ

**Jarrod Villani**

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Chief Operating & Commercial  
Officer & EVP, ViacomCBS ANZ