

## Copyright Agency Ltd

### Modern Slavery Statement

This is the second modern slavery statement (**Statement**) of the Copyright Agency Ltd (**Copyright Agency**). It covers the period from 1 July 2021 to 30 June 2022 (**Reporting Period**). The preparation and submission of this Statement are made pursuant to the requirements of, and in accordance with, the *Modern Slavery Act 2018* (Cth) (**Act**). The reporting entity is the Copyright Agency Ltd (ACN: 001 228 799; ABN: 53 001 228 799).

The purpose of this Statement is to assess and report on modern slavery risks at Copyright Agency and the steps taken by the Copyright Agency to address these risks. Further, it is an opportunity to consider how it will continue to develop and strengthen its response to modern slavery risks in the next reporting period and over time.

In addition to the Copyright Agency's commitment to comply with the Act, addressing modern slavery risks in this Statement is consistent with the Copyright Agency's company values which are:

- **Integrity:** The Copyright Agency is made up of real people who believe in what they stand for and can be trusted to do as they say.
- **Creativity:** The Copyright Agency appreciates the time and unique skill that goes into making original works and how these works entertain, educate and inspire a rich and diverse Australian culture. The Copyright Agency stands up for creators' rights.
- **Responsiveness:** The Copyright Agency is flexible and adapts to change. It listens to others and is quick to respond.
- **Transparency:** The Copyright Agency is open and honest in all its dealings and will take responsibility for what it does. The Copyright Agency works hard to build and foster good relationships.

These values are the foundation of how the Copyright Agency conducts itself and interacts with institutions and commercial clients, its members, suppliers and other stakeholders and how its staff members conduct and interact internally. As such, the Copyright Agency is committed to a culture of compliance and promoting an ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in the Copyright Agency's business operations.

### The Copyright Agency's structure, operations and supply chains

The reporting entity is the Copyright Agency Ltd (ACN: 001 228 799; ABN: 53 001 228 799). The entity's structure is an Australian Public Company, Limited by Guarantee incorporated under the *Corporations Act 2001* (Cth). Its registered office is level 12, 66 Goulburn Street Sydney NSW 2000.

The Copyright Agency Ltd does not own or control other entities and is not part of a larger corporate group of entities.

The board of directors is the principal governing body for the purposes of the Act and is the body with primary responsibility for the governance of the Copyright Agency. It is made up of 11 directors. The board of directors delegates decision making for day-to-day matters to the senior management team which is made up of 4 staff members.

The Copyright Agency's operations are located in Australia in all states and territories where it employs about 54 FTE permanent staff members.

## Overview of the nature and types of activities undertaken by the Copyright Agency

<b>Overview</b>	<p>On behalf of creators of text and images, the Copyright Agency negotiates, collects and distributes copyright fees and royalties, and develops new services and products to facilitate the use of their content. The Copyright Agency also advocates for its members on matters affecting their rights.</p> <p>The Copyright Agency has approximately 39,000 members, who include writers, artists, agents and publishers.</p>
<b>Statutory licence schemes</b>	<p>The Copyright Agency is appointed by the Australian Government to manage statutory licence schemes. The statutory licence schemes allow educational and government use of content without the permissions usually required, but subject to fair compensation to content creators.</p>
<b>Artists' resale royalty scheme</b>	<p>The Copyright Agency is appointed by the Australian Government to manage the artists' resale royalty scheme. The artists' resale royalty scheme pays artists a percentage of the sale price from certain resales of artworks.</p>
<b>Agent for members</b>	<p>The Copyright Agency also licenses its members' works as their agent (e.g. for use in corporations, local governments and not-for-profit organisations).</p>
<b>Cultural Fund</b>	<p>1.5% of licence revenue supports cultural projects through the Cultural Fund.</p>
<b>Other Australian copyright management organisations</b>	<p>The Copyright Agency coordinates with other Australian copyright management organisations that manage licensing for other types of content.</p>

## Overview of the Copyright's arrangements with its suppliers

Depending on the type of services provided, Copyright Agency generally engages with suppliers ranging from:

- short-term on an as-needed basis such as HR recruitment services, catering, and events management;
- to longer term arrangements with suppliers of services such as business infrastructure, external legal and financial services, and technical IT services and support.

Other than suppliers, the Copyright Agency does not have any other business relationships such as joint ventures partners or business partners.

## The Copyright Agency's supply chains

The Copyright Agency suppliers are, for the most part, located in Australia.

- More than 68% of overall spend on supplier services are for services of a highly technical information technology nature such as business infrastructure and cloud-based business services and external professional legal services.

- This was followed by 28% of supplier spend in areas such as consulting services, subscriptions and memberships, and external professional legal and financial services.
- Other suppliers include those typically engaged for running the day-to-day operations of an organization such as HR recruitment, cleaning, storage, and catering services, all of which are located within Australia.

### **The risks of modern slavery practices in the operations and supply chains of the Copyright Agency**

Supplier category assessments were conducted to determine the risks of modern slavery based on supplier type, geographical location and total spend during the Reporting Period. Given that most suppliers that Copyright Agency engages are of a highly technical nature, with 83% of these service providers located within Australia, the risk of modern slavery practices is deemed to be low.

### **Actions taken by the Copyright Agency to address these risks**

Despite the low risk of modern slavery practices within its supplier chain, the Copyright Agency:

1. has conducted an internal audit of its supplier engagements to assess the potential risk of modern slavery practices;
2. has formed a Modern Slavery Working Group consisting of personnel from departments including legal, HR and Finance to determine how new and existing suppliers will be managed and screened for modern slavery risks;
3. has arranged for roll out of a Service Provider Code of Conduct (**SPCC**), which requires service providers that provide substantial services to Copyright Agency confirm that they will comply with the applicable laws with regard to modern slavery.
4. has arranged for roll out of a SPCC training session to managers and staff responsible for procurement of services and goods at Copyright Agency;
5. maintains a register of risk and compliance noting supplier engagements and corresponding contractual risk profiles for the purposes of legal and compliance assurance;
6. abides by the Code of Conduct for Collecting Societies; and
7. maintains a Whistleblower Policy.

### **How the Copyright Agency assesses the effectiveness of actions being taken to assess and address modern slavery risks**

As part of its commitment, the Copyright Agency has elected to appoint the Modern Slavery Working Group to review its response to modern slavery, including assessing existing and new risks, assessing the effectiveness of actions taken over the previous quarter and considering (and if relevant, implementing) steps to further address new and existing risks.

Copyright Agency will continue its commitment to ensuring that it meets its obligations under the Act, including by:

- periodically reviewing its procedures and implementing any changes necessary so that appropriate steps are in place to address any potential risk of modern slavery practices;
- conduct regular reviews of supplier spend and categories for possible modern slavery indicators.

- Conduct regular reviews of the register of signatories to the SPCC to ensure supplier compliance.
- taking proactive steps to ensure that any potential modern slavery risk is identified and addressed appropriately both within Copyright Agency and its suppliers.
- Continued communication and education on the Act and conducting awareness sessions with senior management and managers who engage in procurement activities.

This statement was approved by the members of the board of Copyright Agency.

Signed on behalf of the Copyright Agency Board of Directors

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Kate Harrison, Chair

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Jane Curry, Director