From: svodauscontent
To: [redacted] svodauscontent
Cc: [redacted]
Subject: RE: Further guidance on qualifying expenditure [SEC=OFFICIAL]
Date: Thursday, 23 July 2026 12:34:31 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image007.png

OFFICIAL

Hi [redacted]

No worries at all, we appreciate the engagement.

[redacted]

Cheers,

[redacted]

[redacted]
Senior Regulatory Officer
Local Content and Discoverability

Australian Communications and Media Authority
[redacted]@acma.gov.au
acma.gov.au

The ACMA acknowledges First Nations peoples as the Traditional Owners and Custodians of Australia. We respect and celebrate First Nations peoples as the original storytellers and content creators of the lands on which we work and honour the enduring strength and commitment of Aboriginal and Torres Strait Islander peoples to the land, waters and their communities. We pay our respects to Elders past, present, and emerging.



OFFICIAL

From: [redacted]@wbd.com>
Sent: Thursday, 23 July 2026 11:28 AM
To: svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@acma.gov.au>; [redacted]@wbdcontractor.com>; [redacted]@acma.gov.au>
Subject: RE: Further guidance on qualifying expenditure [SEC=OFFICIAL]

OFFICIAL

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Dear [redacted]

Apologies for the constant stream of questions, but we wanted to seek further clarity on a point relating to expenditure reporting.

s 47, s 47G

s 47, s 47G

I look forward to your feedback - please let me know if you'd prefer to have a meeting to discuss.

Thanks and kind regards

[redacted]

[redacted]

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OFFICIAL

From: svodauscontent <svodauscontent@acma.gov.au>
Sent: Monday, July 13, 2026 12:34 PM
To: [redacted]@wbd.com>
Cc: [redacted]@acma.gov.au>; [redacted]@wbdcontractor.com>; [redacted].@acma.gov.au>; svodauscontent <svodauscontent@acma.gov.au>
Subject: RE: Further guidance on qualifying expenditure [SEC=OFFICIAL]

EXTERNAL SENDER: Caution opening links or attachments

OFFICIAL

Hi [redacted]

Thank you for your patience while we considered the below request.

We appreciate HBO Max's engagement on the implementation of the SVOD Australian Content Requirement to date, and its efforts to acquire and commission Australian content.

s 47, s 47G

s 47, s 47G

s 47, s 47G

s 47, s 47G

s 47, s 47G

For clarity, qualifying expenditure is expenditure made on the commissioning or acquisition of eligible Australian programs before that programs are made available to the public in Australia (other than by being shown in a cinema). However, there is no requirement on the SVOD to premiere the program on its service prior to TVOD/EST exhibition. In other words, the program is not prevented from being shown on any platform or location. What is important is that the expenditure is incurred before it is shown.

The below examples may be of some assistance.

Example 1:

- An eligible Australian program is released theatrically on 2 January 2026
- SVOD A acquires the program on 4 February 2026. Expenditure acquiring the program is incurred on that date.
- The program is then made available for purchase as a DVD or Blu Ray on 10 March 2026, and on an app store on 15 March 2026. This is the first time to program has been made available to the public in Australia (other than a cinema).
- The program is then made available on SVOD A's Australian service on 21 April 2026.

In this example, this is qualifying expenditure because the money was spent acquiring the program on 4 February, before it is made available to the public in Australia (anywhere other than a cinema).

Example 2:

- A new Australian program was released theatrically in February 2025, before being made available for purchase in an app store on 4 April 2025.
- SVOD B acquires that Australian program on 5 May 2026. Expenditure acquiring the program is incurred on that date.
- SVOD B shows the program on its Australian service on 1 June 2026.

In this example, the program was made available to the public (anywhere other than a cinema) on 4 April 2025, before it was acquired by SVOD B on 5 May 2026. this means that SVOD B's expenditure is not qualifying expenditure.

We are happy to arrange a time to meet to discuss any of the information contained in this email.

Senior Regulatory Officer
Local Content and Discoverability

Australian Communications and Media Authority

@acma.gov.au
acma.gov.au

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OFFICIAL

From: svodauscontent <svodauscontent@acma.gov.au>
Sent: Tuesday, 7 July 2026 10:46 AM
To: [redacted]@wbd.com>; svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@acma.gov.au>; [redacted]
[redacted]@wbdcontractor.com>; [redacted]@acma.gov.au>
Subject: RE: Further guidance on qualifying expenditure [SEC=OFFICIAL]

OFFICIAL

Good morning [redacted],

Thank you for checking in. We are aiming to respond within the next week, and will keep you updated.

Thank you for your patience in the meantime.

[redacted]

OFFICIAL

From: [redacted]@wbd.com>
Sent: Monday, 6 July 2026 1:42 PM
To: svodauscontent <svodauscontent@acma.gov.au>
Cc: DL [redacted]@acma.gov.au>; [redacted]
[redacted]@wbdcontractor.com>
Subject: RE: Further guidance on qualifying expenditure [SEC=OFFICIAL]

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Hi [redacted]

Just following up on this.

We look forward to hearing from you - if its easier, we'd be happy to discuss on a call/zoom too.

Thanks
[redacted]

OFFICIAL

From: svodauscontent <svodauscontent@acma.gov.au>
Sent: Tuesday, June 23, 2026 8:19 AM
To: [redacted]@wbd.com>; svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@acma.gov.au>; [redacted]@wbd.com>; [redacted]@wbdcontractor.com>
Subject: RE: Further guidance on qualifying expenditure [SEC=OFFICIAL]

EXTERNAL SENDER: Caution opening links or attachments

OFFICIAL

Good morning [redacted]

Thank you for your attendance at yesterday's Town Hall meeting. I hope you are feeling better.

I'm just acknowledging receipt of the below, and we will be in touch shortly.

[redacted]

[redacted]
A/g Manager
Content Reporting and Bargaining

Australian Communications and Media Authority
[redacted]@acma.gov.au
acma.gov.au

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OFFICIAL

From: [redacted]@wbd.com>
Sent: Thursday, 18 June 2026 2:09 PM
To: svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@acma.gov.au>; [redacted]@wbd.com>; [redacted]@wbdcontractor.com>
Subject: Further guidance on qualifying expenditure [SEC=OFFICIAL]

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Dear [redacted]

Thanks again for all your help with clarifications and further guidance on the implementation. We would like to emphasize HBO Max's good faith efforts and ongoing commitment to meeting its Australian content obligations.

[redacted] s 47, s 47G

s 47, s 47G

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s 47, s 47G

s 47, s 47G

s 47, s 47G

s 47, s 47G

Kind regards

M:
hbomax.com

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