



# Modern Slavery Statement

FY2020

Redbubble Limited (ACN 119 200 592)

# Index

This Modern Slavery Statement (this “**Statement**”) is prepared in accordance with the criteria set out in the Modern Slavery Act 2018.

The table below outlines where information related to each mandatory reporting criteria can be found:

<b>Mandatory criteria for Modern Slavery Statements</b>	<b>Location of information in this Statement</b>
Identify the reporting entity	‘The Reporting Entity’ - Page 3
Describe the structure, operations and supply chains of the reporting entity	‘Redbubble’s business structure and operations’ - Page 6 ‘The Marketplace Supply Chain’ - Page 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	‘Redbubble’s modern slavery risks’ - Page 8
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	‘Redbubble’s actions to assess and address modern slavery risks’ - Pages 9 See also the details of Redbubble’s Social Responsibility Program on Pages 10-13 and ‘Remediation’ on Pages 14 and 15
Describe how the reporting entity assess the effectiveness of such actions	Assessing the effectiveness of our actions - Page 16
Describe the process of consultation with any entities that the reporting entity owns or controls	Process of consultation - Pages 17 and 18
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Our mission - Page 4 Impact of COVID-19 on Redbubble’s modern slavery risks - Page 15

## Modern Slavery Act 2018 - Compliance Statement

This Modern Slavery Statement (this **Statement**) describes the risk of modern slavery in Redbubble's operations and in the third party marketplace supply chain (the **Marketplace Supply Chain**) during the year ended 30 June 2020 (the **Reporting Period**). This Statement also details: (i) the steps that Redbubble and its subsidiaries have taken to minimise this risk; and (ii) the effectiveness of these steps.

### The Reporting Entity

Redbubble Ltd (ACN 119200592) (**Redbubble**) is the reporting entity under the Modern Slavery Act. This statement is made by Redbubble Ltd for itself and on behalf of its subsidiaries (together referred to as "Redbubble" in the Statement).

### Redbubble Board Approval

This statement approved by the Redbubble Limited Board on 30 March 2021.



Anne Ward  
Board Chair  
30 March 2021



Michael Ilczynski  
Chief Executive Officer  
30 March 2021



Two Comets  
by Pikaole

# OUR MISSION...

Redbubble is creating the world's largest marketplace for independent **Artists**, bringing more **Creativity** into the world.

## ... BRINGS A RESPONSIBILITY

Our mission also comes with great responsibility...To not only empower artists and foster self expression, but to do so in **Ethical** and **Socially Responsible** ways.



Quarry, Summer Days  
by **FernandoVieira**

## What is “modern slavery”?

Modern slavery is a severe violation of human rights. It occurs when a person is coerced into work and exploited for personal or commercial gain. Under Australian and international law, it includes offences such as forced labour, servitude, child labour, deceptive recruiting and debt bondage.

### Redbubble’s commitment to addressing modern slavery risks

As a global marketplace, Redbubble places great emphasis on its contribution and impact in the wider community. We know that our commitment to protecting workers in our business and the extended Marketplace Supply Chain is crucial to achieving our mission. Redbubble is committed to assessing and addressing risks of modern slavery within the organisation and throughout the Marketplace Supply Chain in accordance with our corporate values, stakeholder expectations, community expectations and the law.

People are central to our business, and we impact the daily lives of many – our employees and the independent artists, customers, suppliers and workers who participate in the Marketplace Supply Chain. We want those stakeholders to know that we make every effort to operate our business and products available in the Marketplace are sourced ethically, sustainably and responsibly. We are committed to:

- respecting the human rights of workers throughout the supply chain;
- striving to eliminate the potential for labour and human rights issues in our operations and in the Marketplace Supply Chain;
- robust governance of our operations;
- appropriate oversight of the Marketplace Supply Chain; and
- ensuring the whistleblowing process is accessible, transparent and fair.



## Redbubble's business structure and operations

Redbubble operates two online marketplaces for independent artists and designers: Redbubble and TeePublic. Redbubble's headquarters are in Melbourne, Australia. Redbubble also has offices in San Francisco, New York and Berlin. The operating entities within the Redbubble corporate group are as follows:

- The parent company of the group is Redbubble Limited (ACN 119 200 592). Redbubble Limited is listed on the Australian Securities Exchange (ASX:RBL) and is headquartered in Melbourne, Australia.
- Redbubble Inc is a wholly-owned subsidiary of Redbubble Limited, registered in Delaware USA, and operates business from an office in San Francisco. Redbubble Inc facilitates sales, marketing and supply chain functions for the Redbubble marketplace.
- Redbubble Europe GmbH is also a wholly-owned subsidiary of Redbubble Limited, registered in Berlin, Germany. Redbubble Europe GmbH carries out administrative functions in relation to the German, French and Spanish language versions of the Redbubble website.
- TP Apparel LLC is a wholly-owned subsidiary of Redbubble Inc, registered in New York USA and operates business from an office in New York. TP Apparel LLC is the operating company for the TeePublic marketplace.

As at the end of the Reporting Period, Redbubble's global workforce consisted of 293 employees. At all times during the Reporting Period, all employees within the Redbubble corporate group were engaged under written employment agreements that comply with applicable local laws.

The Supply Chain and Operations Team for the Redbubble marketplace is located in San Francisco and managed by Redbubble's Chief Supply Chain Officer, who reports to the Redbubble Chief Executive Officer. The Supply Chain and Operations Team for the TeePublic marketplace is located in New York and managed by TeePublic's Chief Operating Officer, who reports to the TeePublic Chief Executive Officer, who in turn reports to Redbubble's Chief Executive Officer.

# The Marketplace supply chain

Redbubble's operations rely on, and are supported by a globally diversified Marketplace Supply Chain.

## Fulfillment and Blank Product Suppliers:

Facility locations	Facilities in each location
USA	31
UK	5
Australia	4
Germany	3
Canada	3
Netherlands	2
China	1
Spain	1
France	1
Czech Republic	1
Mexico	1
New Zealand	1

## Delivery Service Providers:

Principal office locations	Offices in each location
USA	7
EU	7
Australia	2
UK	3
Canada	3

## Redbubble's modern slavery risks

Redbubble recognises that modern slavery risks can arise both internally and in the Marketplace Supply Chain. During the Reporting Period, Redbubble completed due diligence investigations to understand the modern slavery risks within our internal operations and in the Marketplace Supply Chain.

With respect to Redbubble's internal operations, we have in place a robust suite of policies and procedures, as well as grievance and whistleblowing channels to ensure that we can identify and mitigate any potential risks of modern slavery before they occurs. Based on these management processes, including working rights checks (both initial and ongoing) and onboarding procedures, we have assessed the residual risk of modern slavery in our own operations as very low.

Redbubble has assessed that there is a greater risk of modern slavery being present in the Marketplace Supply Chain, due to:

- the more diverse geographical locations from which products are sourced and fulfilled;
- the lesser degree of visibility that Redbubble has into the employment conditions of the Marketplace Supply Chain participants; and
- the absence of control that Redbubble has over the Marketplace Supply Chain.

However, Redbubble considers that in light of the outcome of our due diligence investigations during the Reporting Period and the operation of the Social Responsibility Program described on pages 9-12 below, the residual risk of modern slavery in the extended supply chain is rated as low.



## Redbubble's actions to assess and address modern slavery risks

Redbubble has broadened its efforts to detect the risk of modern slavery across our business and the Marketplace Supply Chain and ensure we have in place the most appropriate responses to that risk.

We continue to develop our approach and focus on preventing and addressing modern slavery related risk. The principles that guide us are operating with integrity, exhibiting strong corporate governance and ensuring that all people involved in the supply chain are treated ethically with dignity & respect. The key mitigation of modern slavery risk for Redbubble is the Social Responsibility Program that has the elements described below.

### Due Diligence

Redbubble takes a proactive approach to eradicating modern slavery risk from our operations and in the Marketplace Supply Chain. Our risk-based due diligence process is part of our broader Social Responsibility Program and is designed to identify and assess a range of potential risks in the supply chain. As part of our Social Responsibility Program, we extend our due diligence processes to all the Marketplace Supply Chain participants. During the Reporting Period, all Marketplace Supply Chain participants were requested to answer a questionnaire administered by the Supply Chain team. Redbubble received completed questionnaires from all its Marketplace Supply Chain participants as at 30 June 2020. TeePublic received completed questionnaires from all except five of their Marketplace Supply Chain participants as at 30 June 2020 (the remaining five responses were obtained after that date). There were no confirmed cases of modern slavery disclosed in the questionnaire responses and none were apparent from the responses.

### Worldwide Responsible Accredited Production certification requirement

Redbubble is committed to ethically-sourced apparel. Only independent suppliers that value the health and welfare of their staff are permitted to participate in the Redbubble marketplaces. All Marketplace Supply Chain participants hold formal social compliance approvals such as Worldwide Responsible Accredited Production or equivalent certifications.

# Our Social Responsibility Program Is Built Upon Core Foundations



## **Redbubble:**

Our business model  
& supporting Artists



## **Global Operations:**

Living our values in our  
supply chain network



## **Giving back:**

Inspiring good for  
people and the  
environment

## Redbubble's adoption of the Fair Labor Association (FLA) Code of Conduct

Redbubble requires that all Marketplace Supply Chain participants ensure safe working conditions, minimize environmental impact, and treat their employees with respect and dignity. To make sure these requirements are met, they must adhere to the FLA Code of Conduct and its benchmark standards. Whilst the Fair Labor Association is based in the US, its Code of Conduct for supply chains is a recognised global benchmark - based on International Labour Organization standards. The FLA seeks to protect workers in the apparel and agricultural sectors around the world.



### Employment Relationships

Respect and safeguard workers' rights according to national and international laws and regulations.



### Non-Discrimination

Based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, or ethnic origin.



### Harassment or Abuse

Employees are treated with respect and dignity. No physical, sexual, psychological, or verbal harassment or abuse.



### Forced Labor

No use of prison labor, indentured labor, bonded labor, or any other possible forms of forced labor.



### Child Labor

No one employed under the age of 15 or under the age for completion of compulsory education. Whichever is higher.



### Freedom of Association

Recognize and respect the right of employees to freedom of association and collective bargaining.

## FLA Code of Conduct (continued)

Redbubble and third party audit firms conduct site visits to make sure FLA Code Standards are being met. Participants in the marketplace must commit to continually making improvements where Code Standards are not met and assure ongoing compliance in a reasonable and timely manner.

Redbubble supports the *California Transparency in Supply Chains Act*, which requires members of the supply chain to certify compliance, agree to Social Responsibility audits, undergo Social Responsibility training and remain accountable for their actions.



### Health, Safety & Environment

Prevent accidents and injury while taking steps to lessen negative impacts that the workplace has on the environment.



### Subcontracting

Not permitted without prior written approval. Should be monitored for social compliance using FLA Code standards.



### Hours of Work

Can't exceed regular and overtime hours allowed by law. Must give at least 24 consecutive hours of rest every 7 days.



### Code Communication

Post the Code in a visible place frequented by employees in the language spoken by employees, supervisors, and managers.



### Compensation

Should be at least minimum wage, meet workers' needs, provide some extra income, and include required fringe benefits.



### Be a Good Person

This isn't part of the FLA Code, but we think it's super important. Treat others how you'd like to be treated. It's the right thing to do.

## Remediation

Redbubble is committed to the protection and respect of human rights across our business and in the Marketplace Supply Chain. Where modern slavery issues are detected, they will be investigated and substantiated and appropriate action taken. Redbubble has established internal grievance resolution guidelines which outline procedures and resolution options for our employees. We will continue to evolve our approach to deal with such issues

### Internal awareness

Redbubble recognises that its team members who interact with the third party suppliers in the Marketplace Supply Chain are well-positioned to identify indicators of modern slavery risks if they understand and are alert to potential red flags. The Redbubble Supply Chain Team closely monitors the risks of modern slavery in the Marketplace Supply Chain on an ongoing basis.

### Stakeholder feedback

Redbubble' approach to managing its modern slavery risks is assessed on an ongoing basis by a broad network of stakeholders. Redbubble regularly receives feedback on elements of its Social Responsibility Program, and that feedback is used to continuously improve the Social Responsibility Program. Where a legitimate concern or issue is raised or identified as a result of a Redbubble investigation, Redbubble will seek to work with the relevant supplier to ensure appropriate remedy is provided. In all instances, Redbubble will seek to place the affected individual's needs first and an appropriate remedy will be determined on a case-by-case basis.

## Remediation (continued)

### Whistleblower process

Redbubble has established a whistleblower process for the reporting of any suspected unethical, illegal, fraudulent or undesirable conduct, including suspected adverse impacts on people within Redbubble or the Marketplace Supply Chain. The whistleblower process allows for concerns and complaints in relation to modern slavery to be raised confidentially and/or anonymously.

Individuals wishing to make a complaint under the Redbubble Whistleblower Policy may report the matter to either the internal Redbubble Whistleblower Reports Officer, a designated external Whistleblower Reports Agency or to any executive, senior manager or auditor of Redbubble.

Our Whistleblower Policy is published in the Corporate Governance section of our Corporate website at <https://shareholders.redbubble.com/site/investor-information/corporate-governance>

## Impact of COVID-19 on Redbubble's modern slavery risks

Redbubble recognises that COVID-19 has impacted modern slavery risks. As felt across the world, COVID-19 presented a range of new challenges for Redbubble. Protecting our team members' health, both physical and mental, throughout this period remained paramount. To be effective, we quickly adjusted our ways of working by swiftly moving to remote working across our offices and providing specific support to impacted team members.

The global pandemic has restricted Redbubble's ability to assess and address risks in the Marketplace Supply Chain, the main cause of this being the restriction of movement as set by the relevant governments in the areas that the suppliers operate in. This has resulted in Redbubble team members being able to visit sites less often.

In some instances, suppliers required longer lead times to complete their required actions given disruptions to their business operations. In addition, Redbubble's in-house personnel has been restricted in their ability to conduct on-site Social Responsibility audits during the COVID-19 pandemic.



## Assessing the effectiveness of Redbubble's actions:

Redbubble's progress against its modern slavery risk profile is monitored by the Supply Chain Team. The Redbubble Social Responsibility Program provides metrics to help track the effectiveness of the Program.

Regular updates on the effectiveness of risk mitigations is provided to the Audit and Risk Committee as part of the Redbubble risk management framework.

Redbubble will continue to explore further mechanisms to assess the effectiveness of actions we undertake to address modern slavery risk.



Tiny Town On The Patchwork Hill  
by Lisafrancesjudd





## Process of consultation

Our management of modern slavery risk in our operations and in the Marketplace Supply Chain falls within our broader approach to Social Responsibility and is assessed and managed consistently with our established Redbubble enterprise-wide risk framework. Our enterprise-wide risk framework defines the escalation threshold for reporting of supply chain risks to the Audit and Risk Committee. The Audit and Risk Committee is responsible for providing oversight of that risk framework on behalf of the Board.

Further information relating to the risk management framework can be found in the Corporate Governance section of the Redbubble Corporate website - at <https://shareholders.redbubble.com/site/investor-information/corporate-governance>

Redbubble's Social Responsibility Program therefore involves engagement with the Redbubble Board and Audit and Risk Committee and its day to day operation is monitored by the Executive Team and Supply Chain and Operations Teams. The Redbubble People and Culture Team and Legal Teams also contributed to the monitoring and mitigation of supply chain risk and advise on process and regulatory aspects.

## Process of consultation (continued)

Redbubble Limited Board: The Redbubble Board is ultimately responsible for the oversight of Redbubble Social Responsibility Program. It receives and reviews regular reports on the status of the Program. The Redbubble Executives who hold responsibility for the day-to-day execution of our Social Responsibility Program are regularly invited to present to the Board on the content of the report and to answer questions.

Audit and Risk Committee: The Audit and Risk Committee is a committee of the Board. As Social Responsibility had been identified as a material risk to Redbubble, it is responsible for evaluating Redbubble' Social Responsibility performance and the effectiveness of our Social Responsibility risk management systems and processes.

Supply Chain and Operations Team: The Redbubble Supply Chain and Operations Team manage the relationships with the Marketplace Supply Chain and have primary responsibility for ensuring that products are sourced ethically, and are responsible for the day-to-day execution of the Social Responsibility Program. The Redbubble Executive team and the Redbubble Limited Board is regularly updated on the status of the Social Responsibility Program and human rights commitments.

Legal Team: The Redbubble Legal Team is responsible for advising on statutory and regulatory requirements in the modern slavery area, including the reporting requirements under the Modern Slavery Act 2018. The Legal Team also conducts training to relevant staff in this area – aimed at ensuring team members understand Social Responsibility responsibilities.

People and Culture Team: The People and Culture team is responsible for ensuring systems and controls exist to prevent modern slavery in Redbubble's own operations.

## *End of Statement*

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### **About Redbubble Group**

Founded in 2006, the Redbubble Group incorporates Redbubble Limited and its subsidiaries, including TP Apparel LLC (TeePublic). The Redbubble Group owns and operates the leading global online marketplaces, Redbubble.com and TeePublic.com, powered by independent artists. The Redbubble community of passionate creatives sell uncommon designs on high-quality, everyday products such as apparel, stationery, housewares, bags, wall art and so on. Through the Redbubble and TeePublic marketplaces, independent artists are able to profit from their creativity and reach a new universe of adoring fans. For customers, it's the ultimate in self-expression. A simple but meaningful way to show the world who they are and what they care about.

