



The Media Store (Australia) Pty Ltd
ACN 096 878 143

Tradingas

the**media**store.

Modern Slavery Statement FY21

February 2022

www.themediastore.com.au



A message from the Chief Executive Officer of the **mediastore**.

As stated in our first Modern Slavery Statement, the Media Store firmly believes that everyone, everywhere has the right to a life free from slavery, where they have the freedom to make safe, dignified choices about their lives.

The Media Store remains committed to having a supply chain and operations that prevent the use of modern slavery and where modern slavery is identified, takes action to combat and eradicate it. As a demonstration of our ongoing commitment, we have published our second Modern Slavery Statement.

During the Reporting Period covered in our second Modern Slavery Statement, our operations have remained steady, and our supply chain has not changed significantly. Accordingly, we have not identified any cases of Modern Slavery harm in our operations and our supply chain risk remains low. Despite our assessment, we have identified some areas for further improvement.

We reiterate that in these initial reporting years, the emphasis will be on transparency, framework development and a commitment to a program of continuous improvement in identifying and dealing with Modern Slavery to bring about meaningful human rights change.

This Modern Slavery Statement was approved by the Board on February 10, 2022.



A handwritten signature in black ink that reads "Stephen Leeds". The signature is fluid and cursive.

Stephen Leeds

Chief Executive Officer

A handwritten signature in black ink that reads "W Hill". The signature is cursive and somewhat stylized.

Warren Hill

Director

10-2-2022



1 Overview of the **mediastores**. modern slavery tracking

Throughout 2021, the Media Store (Australia) Pty Ltd, ACN 096 878 143 (**TMS**) remained committed to the continuous work necessary to identify, assess and prevent modern slavery practices within its operations and supply chains.

We continue to recognise the importance of ongoing due diligence in identifying and appropriately addressing the risks of modern slavery practices within our operations and supply chains.

After reviewing the nature of our business for the period ended 30 June 2021, our direct impact in relation to modern slavery practices is low and remains unchanged from the previous reporting period. As we are a small sized entity with approximately 30 employees, the resources available to implement and monitor our management systems and controls is limited. Notwithstanding, we remain committed to developing a robust, three-tiered framework which focuses on our human rights commitment, due diligence and remediation as illustrated in the image below.

Our developing modern slavery response is informed by the *United Nations Guiding Principles on Business and Human Rights*. While we are in the early stages of acting to address the modern slavery risks we have identified, we endeavour to implement management processes and controls to integrate our findings, track our progress and to provide effective remediation to individuals and communities impacted by modern slavery.



2 Our structure, operations and supply chain

Who are we?

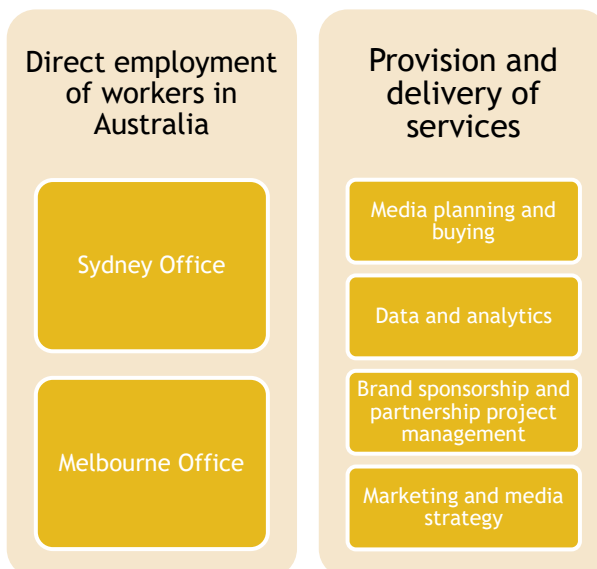
The reporting entity of this Modern Slavery Statement is The Media Store (Australia) Pty Ltd, ACN 096 878 143 (**TMS**). The structure of the reporting entity remains unchanged since our previous Modern Slavery Report.

TMS is an independent, locally owned media agency operating in Sydney and Melbourne. TMS is a standalone company which operates as trustee of the Hill Family Trust No.2 trading as the The Media Store. For the period 1 July 2020 to 30 June 2021 (**Reporting Period**) TMS had a sister company The Media Store Pty Limited, ACN 076 228 683 with which it shares common directors and shareholders.

TMS's sister company provides core administrative and support services to TMS. On June 30th, 2021 TMS had a total workforce of approximately 33 employees.

Our operations

During the Reporting Period, TMS continued to conduct all operations in Australia. The key activities of TMS's operations include:

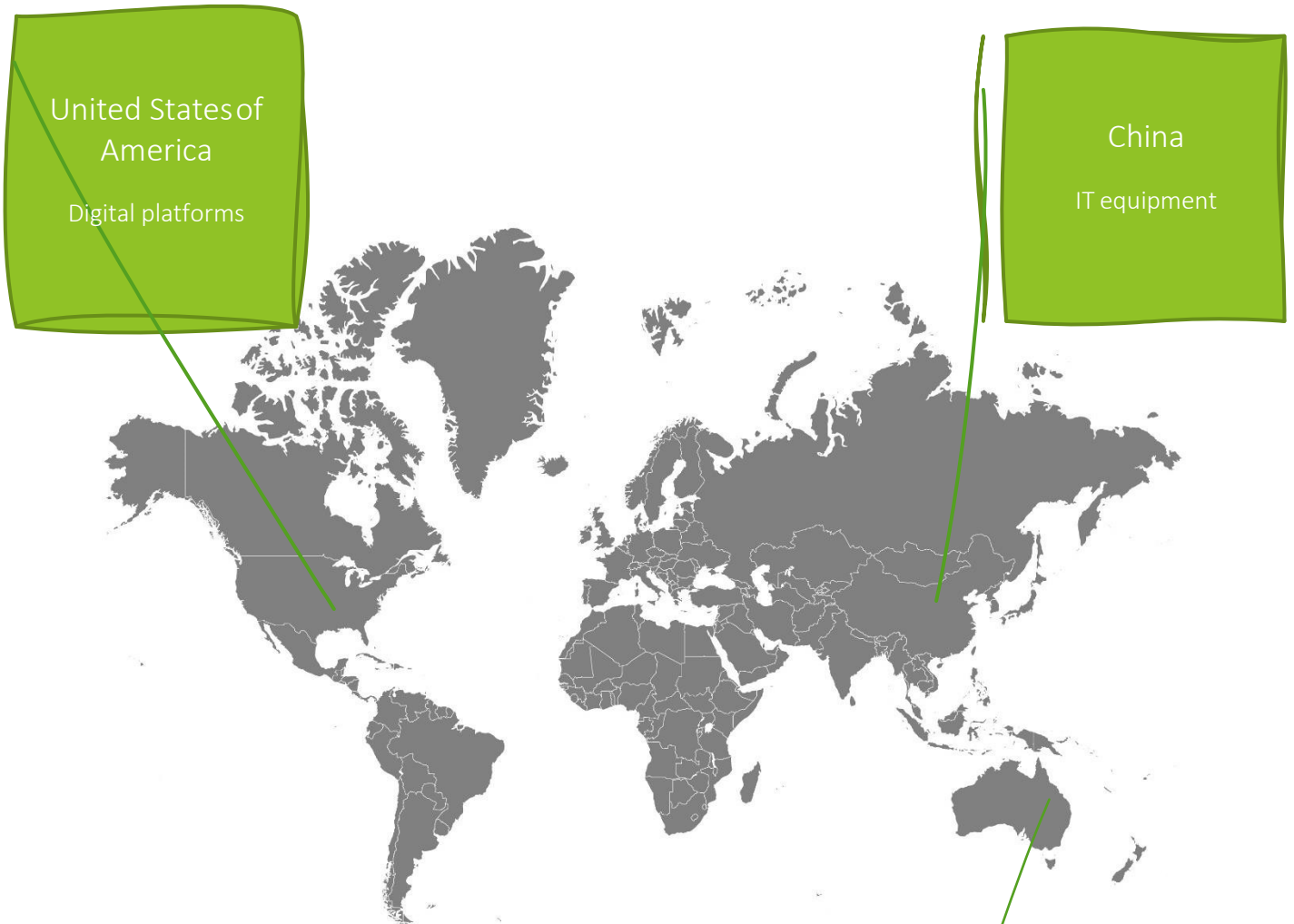


Our supply chain

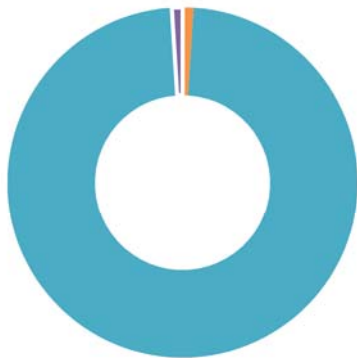
Our supply chain remained steady and unchanged during the Reporting Period. The main categories of goods and services procured in the Reporting Period are:



Location of the **mediastore.** suppliers



In 2021, 99% of TMS suppliers were based in Australia



- United States of America
- Australia
- China

Australia

- Media partners and digital platforms
- Production suppliers and data providers
- IT services
- Corporate services such as legal, accounting and finance
- Leasing of offices
- Office operations such as cleaning and maintenance
- Human resources

3 Our modern slavery risks

As noted in our first Modern Slavery Statement, TMS acknowledges the complexity of modern slavery risk and the ways it can manifest in operations and supply chains. Following our initial assessment in the previous reporting period, TMS undertook a re-assessment of the modern slavery risks within our operations and first-tier suppliers during the Reporting Period. We remain aware and acknowledge that modern slavery risks exist within the advertising industry however, given the size of TMS and our large supplier base, we do not have the resources to examine modern slavery risks beyond our first-tier suppliers. Notwithstanding this limitation, we remain committed to improving our modern slavery processes and engagement with our suppliers.

We remain focused on increasing supplier engagement to assist us and our suppliers in identifying modern slavery risks. In instances where our suppliers have published their own Modern Slavery Statement, we have considered these in undertaking our assessment.

This Reporting Period, 99% of TMS's suppliers were based in Australia and the provision and delivery of TMS services and the employment of our staff occurred in Australia. As a result, our assessment of the risk of modern slavery within our operations and the first tier of our supply chain remains low and unchanged from the previous reporting period.

Notwithstanding our assessment, we recognise TMS may be directly linked to modern slavery practices through the various tiers of our supply chains. These risks are identified below:



4 Our action

Due diligence

TMS reconfirms its commitment to preventing modern slavery practices in its operations and supply chains. We continue to recognise the importance of modern slavery due diligence as an ongoing process and as a vital part of our role to prevent modern slavery practices.

Following our introduction of the Supplier Code of Conduct (SCC) in the previous reporting period, we continued to utilise and provide the SCC to all new suppliers. The SCC sets out TMS's expectation that suppliers must not engage in modern slavery practices and is a key tool in assisting TMS identify and assess the actual and potential human rights impacts within our operations and supply chain.

During the Reporting Period, TMS continued our practice in conducting supplier and business number checks to confirm the legitimacy of our suppliers prior to engagement.

All TMS labour was sourced locally during the Reporting Period. We have internal policies in place that comply with Australian and international labour laws such as our *Discrimination & Harassment Policy* and our *Workplace, Health & Safety Policy*. In the Reporting Period, we finalised our *Anti-Bribery & Corruption Policy* which is provided to suppliers prior to entering into new contractual arrangements.

TMS has made some strides to implement processes to integrate and track modern slavery risks within our operations and supply chains. We have put into place compulsory

internal training on modern slavery and incident reporting for all new employees of TMS as part of our employee onboarding process. The training comprises a 20 minute online interactive module which assists employees in identifying modern slavery risks within the workplace. We are also in the process of implementing management systems and controls to monitor and assess our progress of implementation actions on a regular basis.



Identification

- Supplier Code of Conduct
- Supplier ACN and ABN checks
- Internal policies



Integration

- During 2021 we implemented compulsory internal modern slavery training and processes for incident reporting



Tracking

- We are working towards implementing an internal audit of our supplier screening processes to monitor our progress



Communication

- Publishing our FY2021 Modern Slavery Statement

Remediation

TMS remains aware that, while we do not directly cause or contribute to modern slavery, we may be linked to modern slavery practices by a business relationship.

We acknowledge that given the size of our business, TMS has limited leverage to influence some of our larger suppliers to change their behaviour. Notwithstanding, TMS remains committed to using our leverage to work with suppliers that have caused adverse impacts to prevent or mitigate harm and its recurrence.



We acknowledge there are gaps within our current processes and as a result, TMS does not currently provide effective remediation for individuals and communities affected by modern slavery practices and other human rights abuses.



TMS continues to commit to addressing human rights grievances. As noted in our previous Modern Slavery Statement, we are reviewing the development of a modern slavery response framework relevant and proportionate to our business and operations to provide more effective grievance mechanisms and avenues for affected individuals and communities to come forward. Some of these mechanisms are listed in the diagram to the right.



Grievance and complaints handling policy

'Speak up' policy



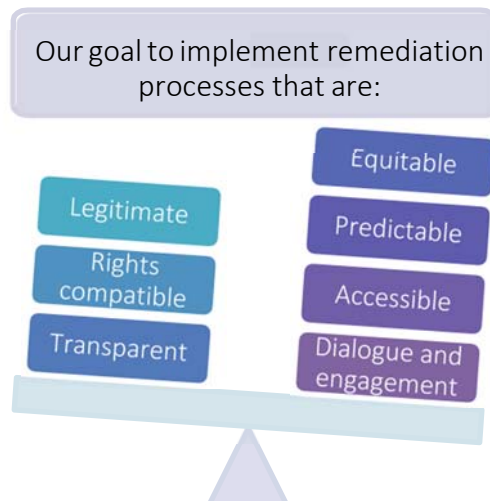
Dialogue with key stakeholders

Contractual clauses with dispute resolution



Supply chain hotline

Our developing strategic approach to remediation is informed by Principle 31 of the *United Nations Guiding Principles on Business and Human Rights* and aims to provide grievance mechanisms that are 'effective' in so far as they can be characterised as being:



5 Assessing the effectiveness of our actions

As stated in our previous Modern Slavery Statement, TMS's monitoring and reporting program is currently under development. Our objective is to operationalise the fundamental human rights due diligence principles in line with the *United Nations Guiding Principles on Business and Human Rights*.

We recognise the process of developing a robust, effective and sustainable monitoring program requires time and resources.

Our focus during the Reporting Period was on implementing a framework which targets raising awareness of modern slavery risks in the workplace and on identifying and addressing the risks to the best of our ability.

Our introduction of our compulsory modern slavery training module as part of our onboarding process for new TMS employees has had a positive response and a significant impact on raising our employees' awareness of modern slavery risks within our operations and supply chains. Our action taken during the Reporting Period will assist us in building a strong foundation to monitor and assess the effectiveness of our actions to combat modern slavery.



6 Process of consultation

Consultation with our sister entity was not necessary in the preparation of our Modern Slavery Statement as the officers and personnel of that company are the same officers and personnel of TMS.



7 Any other relevant information

Continuous improvement: planned next steps

TMS remained a relatively small business with only 33 employees and does not have significant resources to channel to Modern Slavery issues or look in detail at downstream supply chains of its first-tier suppliers. This impacts on TMS' ability to implement organisational change promptly.

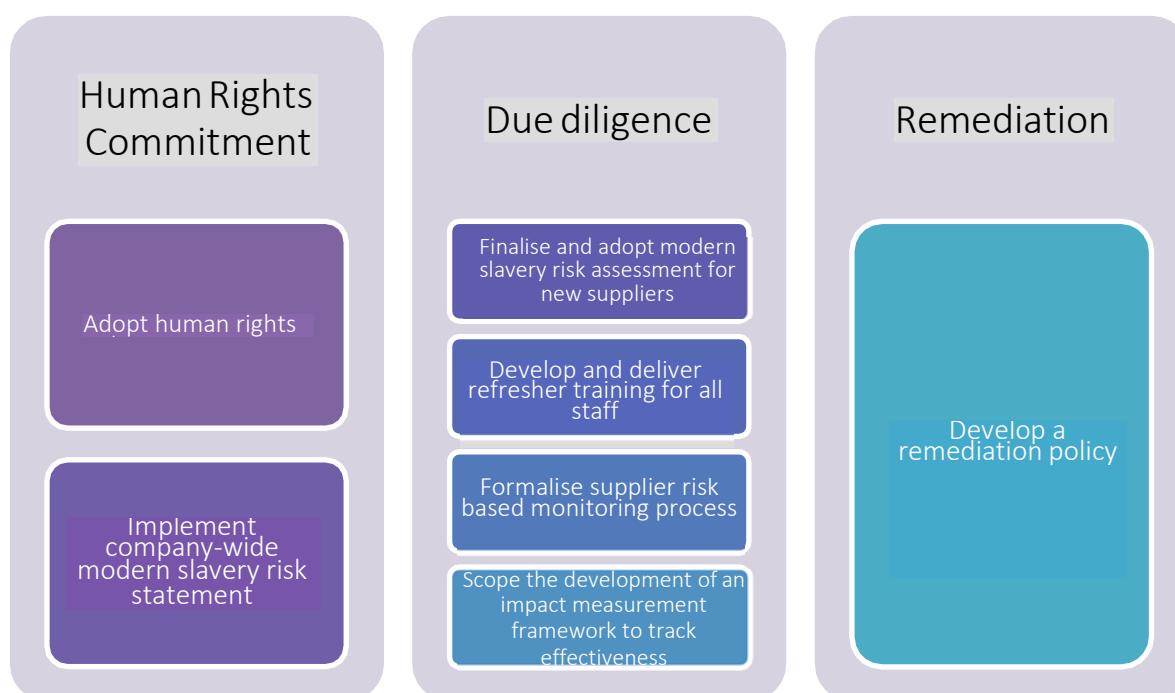
TMS is also limited in what pressure it can exert on suppliers as most of its significant suppliers are large entities.

Despite these limitations, TMS continues to seek advice and develop its processes in a way which aligns with its resources and abilities. TMS remains committed to managing Modern Slavery issues in an appropriate manner given the low level of risk assessed for Modern Slavery in its operations and supply chains for the Reporting Period.

During the Reporting Period, TMS has taken steps to improve its awareness of Modern Slavery risks and how to respond to those risks. There has been ongoing and noticeable improvement since the last reporting period and TMS continues to commit itself to implementing a Modern Slavery framework and a process of continuous improvement to address Modern Slavery issues in its operations and supply chains.

TMS will continue to progress the implementation of its due diligence processes and its grievance mechanisms. TMS aims to continue developing and expanding its processes to assess the effectiveness of its actions.

The table below provides an overview of TMS's priorities for FY22 which are the same as those for FY21.





For queries relating to this statement:

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February 2022.