

# Modern Slavery Statement

FY23

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## Message from the Chairman and CEO

Modern slavery is an abhorrent violation of human rights, unconstrained by geographic borders and from which no industry - even online marketplaces - is entirely immune. No single entity can eliminate modern slavery, however, every entity has a responsibility to address the issue within their span of control. Addressing modern slavery demands the collective and collaborative efforts of governments, international organisations, civil society, and the private sector.

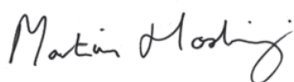
For Articore Group and its marketplaces, Redbubble and TeePublic, this means our work extends beyond our 245 employees in Australia, the United States, and Europe. For example, our efforts to address modern slavery risks include 50 third-party fulfillers whose employees turn the digital art created by artists into physical products. These front line workers are not employed by the Group, however, we recognise the responsibility we have to ensure we are respecting their fundamental human rights through programs such as independent, onsite auditing and anonymous interviews.

There are, unfortunately, no silver-bullet solutions to combating modern slavery. Still, the Group will continue using a variety of approaches through collaboration and best practices to learn and push for change. We will also continue to keep public transparency a priority - consistent with our broader ESG strategy - in order to share our learnings and continue holding ourselves accountable with stakeholders.

We trust this annual update delivers insights into how we have, and will continue to, address modern slavery. As we have shared in past public reporting, the Group's marketplaces, since their inception, have always emphasised a strong focus on social good. With this in mind, we will continue to take action and report publicly on our efforts to ensure our people and those contributing to our marketplace are treated with fundamental dignity and respect.



**Anne Ward**  
Chairman



**Martin Hosking**  
Group Chief Executive Officer and Managing Director

*The FY23 Modern Slavery Statement was approved by the Articore Board of Directors on 30 November 2023*

# 1. About Articore

The Group was founded in 2006 and comprises two global online marketplaces: Redbubble.com and TeePublic.com. In FY23, the Redbubble and TeePublic marketplaces connected over 700,000 selling artists and creators who use our marketplaces to design and sell products printed with their art, 7.5 million of their customers, and 50 third-party fulfillers globally, helping to bring more creativity to the world.

The Group's marketplaces enable creators to quickly upload artwork to their marketplace of choice. Consumers are then able to find that unique piece of art and purchase it on different physical products. Once purchased, the product is printed on demand by one of 50 fulfillers and shipped by a carrier directly to a customer.

Dozens of different physical products are available across the Group marketplaces. Below is a non-exhaustive list of the types of products customers can choose to have fulfillers print artwork on.

- Clothing (t-shirts, hats, skirts)
- Stickers
- Phone cases
- Wall art
- Pet products (scarves, mats)
- Accessories (backpacks, mugs)
- Stationary (greeting cards, notebooks)

The Group operates around the world. Our headquarters are located in Australia (Melbourne) and we have offices in the United States (New York City and San Francisco) and Germany (Berlin). Artists and fulfillers who participate in our marketplaces are third parties who operate their own independent businesses.

As at the end of FY23, the Group's workforce consisted of 245 employees. Below is a breakdown of the composition of our workforce:

- 37% Melbourne; 32% New York; 26% San Francisco; 6% Berlin
- 96% full time; 4% part time
- 84 new hires in FY23

The Group's workforce includes professional services and administrative roles, such as software engineering, marketing, finance, and product/program management.

The operating entities within the Group are as follows:

- The parent company of the group is Articore Group Limited (ACN 119 200 592). Articore Group Limited is listed on the Australian Securities Exchange (ASX:ATG).
- Redbubble Inc. is a wholly-owned subsidiary of Articore Group 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 a wholly-owned subsidiary of Articore Group 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.

Articore Group Limited (ACN 119 200 592) is the reporting entity under the Modern Slavery Act and this statement is made by Articore Group Limited for itself and on behalf of the subsidiaries referred to above. These subsidiaries are consulted in the development of our response to modern slavery risk and the content of this statement.

Unless otherwise noted, the information provided in each section of the statement applies to all reporting entities listed above. Where appropriate, we have provided specific information about reporting entities' individual circumstances and contexts.

Our approach to modern slavery is Group wide. Internal stakeholders across each of the entities above were consulted during the drafting of this statement and were given the opportunity to review and provide feedback at several stages of the process.

## Governance

Governance over modern slavery and how Articore assess and addresses those risks sits with the following personnel:

- Articore's Board of Directors has ultimate oversight of, and accountability for modern slavery risks within the Group, which includes approving this statement, risk assessments, reporting, and action plans.
- The Vice President of Environmental, Social, and Governance is responsible for organising the Group's company-wide strategy.
- Executive Team members across the Group, along with Redbubble and TeePublic CEOs reporting to the Group CEO, are accountable for the Group's initiatives to identify and address modern slavery. For example, Redbubble's Chief Supply Chain Officer oversees the Supply Chain Social Responsibility program, which works with independent auditors to conduct supply chain assessments across RBO and TPO marketplace fulfillers in order to identify indicators of modern slavery.
- Senior Leaders reporting into the Executive Team are responsible for executing initiatives to identify and address modern slavery within their functional area. For example, the Director - Quality & Social Responsibility and Social Responsibility Operations Manager are responsible for executing programs to ensure RBO and TPO marketplace fulfillers align with the Group's Social Responsibility standards, which prohibit forced labour.

## 2. What is Modern Slavery?

The International Labour Organisation estimates 50 million people were living in modern slavery in 2021; of which 28 million were in forced labour - a significant increase over the prior five years. Modern slavery occurs when a person is coerced into work and exploited for personal or commercial gain.

Under Australian law, modern slavery includes the following forms of exploitation:

- |                           |  |
|---------------------------|--|
| I. Trafficking in persons | V. Debt marriage                                 |
| II. Slavery               | VI. Debt labour                                  |
| III. Servitude            | VII. Deceptive recruiting for labour or services |
| IV. Forced labour         | VIII. Child labour                               |

According to the Australian Border Force, “modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers, although these practices are also harmful and may be present in some situations of modern slavery.”

The [International Labor Organisation](#) and [Australian Government](#) have in depth information and further resources on modern slavery.

### 3. Modern Slavery Risks

The Group recognises that modern slavery risks can arise internally within our own operations/workforce and, independently, in the marketplace supply chain. To assess risk, we recognise - as has been documented through research and data available, for example through the Global Slavery Index - that different sectors and geographic regions carry different modern slavery risk profiles. We also recognise the responsibility we have - as set forth by the UN Guiding Principles - to establish programs to assess and address where Articore’s activities may cause, contribute, or be directly linked to modern slavery.

#### Our Operations

With respect to the Group’s internal operations, we have in place a robust suite of policies and procedures, as well as grievance and whistleblowing channels to assist in identification and mitigation of potential risks of modern slavery. Based on the location of the workforce (Australia, US, Germany), office setting (leased/co-located vs owned), job composition (professional services), management processes (working rights checks) and onboarding procedures (code of conduct), we have no indication of modern slavery in our own operations.

#### Third-party Marketplace Operations

##### Marketplace Fulfillers

Third-party fulfillers, not owned by the Group, operate printing equipment facilities that transfer artwork found on Redbubble or TeePublic marketplaces onto blank products in order to make physical products on behalf of artists and their customers. These fulfillers have operations in the following countries:

- Australia
- Canada
- Czech Republic
- France
- Germany
- Mexico
- Netherlands
- Spain
- United States
- United Kingdom

The composition of roles at these fulfillers include, for example, printing specialists, shipping clerks, and sales associates. Modern slavery risks at these sites would include forced/mandatory overtime. To mitigate risks of modern slavery within these fulfillers own operations, the Group has taken steps to raise awareness and we have engaged independent third-party auditors to perform on-site audits (see *Redbubble's Response* on the next page).

## Beyond Tier 1 of the Marketplace Supply Chain

Modern slavery risks also exist within the operations of companies that make and sell blank products to fulfillers, such as the companies that manufacture blank clothing or notebooks (tier 2) and, in turn, companies that process and sell the raw materials in those products, such as fabric or paper (tier 3). We currently lack complete visibility down to the deepest tiers of the product supply chain (e.g., mills) and this lack of visibility presents unknown risks of modern slavery. To address this issue, in FY22, we began, in collaboration with tier 1 fulfillers, to map out the more distant tiers of the marketplace supply chain (suppliers to fulfillers). We are unaware of any instances of modern slavery in FY23 as a result of this work.

## 4. Articore's response to Modern Slavery Risks

### Investments

In FY23, the Group maintained its investments in people and programs designed to address modern slavery and, more broadly, social responsibility. This includes a Vice President of Environmental, Social, and Governance whose organisation - which includes a Social Responsibility Operations Manager - engages with RBO and TPO marketplace fulfillers on modern slavery awareness and coordinates social compliance audits through third party audit firms.

### Policy and Training

#### Modern Slavery Guidance and Risk Screening Toolkit.

In FY22, we developed and distributed to marketplace fulfillers educational materials concerning the risks of modern slavery. These materials provide, for example, a background on modern slavery and its risks, recommendations for assessing and addressing modern slavery, and expectations for their participation in the marketplaces.

### Fulfiller Engagement

Our efforts to address modern slavery do not stop at policies and acknowledgements alone. In FY22, we launched a program of engagement with fulfillers as described below:

- **Content:** Information on the regulatory landscape of modern slavery, current trends, potential risks in the direct and indirect supply chain, red flags and triggers to indicate further investigation may be warranted that a modern slavery issue may be occurring.
- **Scope:** 45-60 minute educational information sessions with fulfillers and service providers participating in the Redbubble and TeePublic marketplaces

- **Approach:** The modern slavery guidance materials were shared in a guide electronically, and reviewed either in person on site with the fulfiller, or via a virtual meeting with the appropriate parties at the fulfiller/service provider.
- **Information sharing session:** In 2022, 55 different third party fulfiller sites were provided education on this topic with approximately 110 direct participants representing their respective sites. In 2023, 4 new sites were engaged on this topic. New participants to Group marketplaces are provided such sessions during the onboarding process.
- **Results:** Reviewing these materials directly with our marketplace participants gives us an opportunity to openly discuss the challenges surrounding labour and sourcing, while sharing both the direct experiences of marketplace participants along with industry wide trends. Recruitment of temporary workers came up frequently given marketplace participants shared that they have had to employ a variety of new recruiting practices to attract workers. The sharing of these materials was critical in helping many of them to ensure they understood potentially deceptive recruiting practices.

## Independent Audits

On-site audits, which include indicators of forced labour, are conducted by an independent audit firm. Fulfillers are expected to adhere to the standards laid out in the Fair Labor Association (FLA) Code of Conduct. The Fair Labor Association standards are derived from the International Labor Organisation and recognised as a global benchmark. FLA's code defines standards for upholding workers' rights, including the following direct and indirect indicators of modern slavery:

- **Harassment or Abuse:** No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.
- **Forced Labour:** There shall be no use of forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.
- **Child Labour:** No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.
- **Freedom of Association:** Employers shall recognise and respect the right of employees to freedom of association and collective bargaining.
- **Hours of Work:** Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed.
- **Compensation:** Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income.

Intertek, an independent auditor, conducts social responsibility audits based on the above standards as part of the process to participate in Group marketplaces. As of Nov 2023, Intertek audited 99% of fulfillers and zero instances of child labour or forced labor were identified. Our commitment is for Intertek to audit 100% of fulfillers by the end of CY2023.

Articore is committed to respecting human rights across our business and in the marketplace supply chain. We are also committed to cooperating in remediation where our operations caused or contributed to modern slavery-related impacts. Where a legitimate concern or issue is raised or identified by an employee, a fulfiller or other third party, we will seek to work with the relevant party to investigate and ensure an appropriate remedy is implemented. In all instances, we will seek to place the affected individual's needs first and the appropriate remedy will be determined on a case-by-case basis.

## Working with others to address Modern Slavery

Articore recognises the value and necessity of working with other organisations that share our principles, including complex global issues such as modern slavery that will not be solved by one entity alone. In FY23, Articore partnered with Intertek to assess modern slavery risks in businesses not owned by Articore, but that participate in our marketplaces (see above). In addition, Articore joined the Business for Social Responsibility group in FY23, a network of companies working together to identify best practices around environmental and social impacts - including human rights. We will continue to seek out multi-stakeholder partnerships that are working in various ways to address modern slavery.

## 5. How Articore Assesses the Effectiveness of our Actions

Our management of modern slavery risks is assessed and managed according to Articore's enterprise-wide risk framework, which defines the escalation threshold for reporting risks to Articore's Audit and Risk Committee. The Audit and Risk Committee is responsible for providing oversight of that risk framework on behalf of the Board.

As an example, Social Responsibility - specifically within businesses participating in Group marketplaces, but not owned or controlled by the Group - has been identified as a material risk to Articore. The Audit and Risk Committee is responsible for evaluating and overseeing the effectiveness of our Social Responsibility risk management systems and processes, which include assessing and addressing risks of forced labour. Articore's Environmental, Social, and Governance strategy also encompasses modern slavery and a public commitment to ensure 100% of marketplace fulfillers are aligned to Articore's Social Responsibility standards.

The Articore Board has ultimate oversight of modern slavery related risks and activities, including but not limited to the annual review and approval of Articore's modern slavery statement.

**Inquiries regarding Articore's Modern Slavery Statement or related concerns can be sent to [esg@articore.com](mailto:esg@articore.com).**