

Modern Slavery Statement 2024

Penguin Random House Australia Pty Ltd (**Penguin Random House Australia**) is Australia's largest trade book publisher and distributor.

We exist to connect the world with the words that matter, through books that spark thoughts, dreams, conversations and learning. Consistent with our values, we condemn forced or child labour and any form of exploitation or discrimination.

This Modern Slavery Statement is made for the year ending 31 December 2024 in accordance with the Modern Slavery Act 2018 (Cth) (**Act**) and is approved by the Board of Penguin Random House Australia. Each year, our statements will build on our actions to assess and address risks of modern slavery as defined in the Act and beyond.

1. About Penguin Random House Australia and its suppliers

We are part of the Penguin Random House group of companies, the world's largest trade publisher. Penguin Random House Australia is ultimately owned by the global media, services and education company Bertelsmann SE & Co KGaA (**Bertelsmann**). Penguin Random House Australia does not have any subsidiary entities.

We employ 350 FTE staff (as at 11 June 2025) across Australia, primarily in Melbourne and Sydney. Our warehouse and distribution division operates from Melbourne.

We believe that all workers have a right to fair labour conditions and a safe environment as set out in the International Labour Organisation Conventions, the Universal Declaration of Human Rights and the UN Global Compact.

We adhere to our [Code of Conduct](#), including the principle of ensuring that fair working conditions is an integral part of our corporate culture. This Code of Conduct applies to all Penguin Random House companies worldwide and Bertelsmann controlled entities.

2. Our supply chain and modern slavery risk

We procure goods and services from a wide variety of providers, which encompass the manufacturing, storage and distribution of our publishing, audio and digital content.

We generally have long term relationships (ie, more than five years) with our suppliers.

Our suppliers predominantly operate within Australia except that we and our related Penguin Random House group companies engage some large printing companies operating from the United States, China and Japan.

According to the Global Modern Slavery Index, the goods that we source directly or indirectly from China present a higher risk of modern slavery. In the first tier of our supply chain, this includes books printed in China. The second tier of our supply chain includes products that our Australian suppliers provide, which may be made from materials sourced from China and other higher risk jurisdictions.

3. Assessing and addressing modern slavery risk

We remain actively committed to ensuring that all our products are responsibly and ethically sourced.

Our practice of engaging suppliers includes an agreement to comply with the [Bertelsmann Supplier Code of Conduct](#) (previously the Penguin Random House Supplier Code of Conduct), which prohibits using or tolerating any form of forced or child labour.

Printing suppliers remain committed to the Book Chain Project's [Publishing Industry Code of Conduct](#) for labour standards. Under this Code, the printing suppliers agree:

- not to use forced, bonded, indentured or compulsory labour, or involuntary prison labour;
- not to withhold payments of wages to workers;
- not to directly or indirectly engage in or support human trafficking;
- not to require employees to pay recruitment costs or fees, or lodge financial deposits or identity documents to secure or retain employment; and
- not to prevent free movement of employees.

Printing suppliers also remain required to undertake annual approved and independent audits against this Code. These audits include full access to (a) the site for inspection, (b) full, transparent records and (c) randomly selected employees for confidential interviews.

The audit reports also confirm whether suppliers have written policies prohibiting modern slavery and provided training to relevant staff. Where an audit reveals minor non-compliances not directly related to modern slavery, we expect that the issues are addressed and reported.

Through the Book Chain Project, all member publishers (including other key publishers) have access to the audit results.

We have a policy of only sourcing merchandise from suppliers that can provide information and assurances on the supply chain, particularly with respect to labour conditions. We have a preference towards established, approved suppliers.

We have a zero tolerance to modern slavery in all forms and have a policy of ceasing our relationship with any supplier that participates or condones modern slavery.

4. Assessing our actions and next steps

Our 360° review framework for assessing the effectiveness of our actions includes:

- monitoring audit reports on suppliers for any indications of modern slavery or trends that may increase the risk of modern slavery - our review of audit reports has not identified any indication of modern slavery;
- monitoring for any modern slavery complaints within our industry (including customers) regarding our supply chain; and
- engaging with business partners and internal auditors on our modern slavery practices and reviewing feedback for potential areas of improvement.

To supplement the audit reports on our printing suppliers, we inspected a selection of printing suppliers in China to observe working conditions and overall staff wellbeing.

We continue to review our approaches to assessing and addressing modern slavery risk to identify areas for improvement. This includes considering our procurement practices with the operation of our new distribution facility in 2025.

A handwritten signature in black ink, reading "Julie Burland". The script is cursive and elegant, with the first letter of each word being capitalized and prominent.

Julie Burland
Chief Executive Officer, Penguin Random House Australia