



Modern Slavery Statement

For the year ending 31 December 2023

1 Introduction

This statement is made by Are Media Pty Limited (ACN 053 273 546) (**Are Media**) under the *Modern Slavery Act 2018* (Cth) (**Act**) for the year ending 31 December 2023. It is made on behalf of Are Media and its related bodies corporate (**Are Media Group**).

We recognise that as the world evolves to become ever more connected via trade channels but at the same time faces serious threats to its stability through ongoing armed conflict and the risks posed by climate change, it is incumbent on businesses to take a leadership position in protecting human rights, and in particular, in addressing modern slavery risks within their businesses and in their supply chains. Eradication of modern slavery is a collective responsibility of all businesses as well as individuals. A major way in which businesses such as ours can effect change is by engaging regularly with staff, suppliers and others to ensure that all relevant stakeholders, whether required to report under the Act or not, are aware of the high standards of human rights performance which Are Media expects from our people and our suppliers. Such regular engagement ensures modern slavery risk remains part of the collective consciousness when doing business. Are Media is committed to continuing regular engagement with its people and its suppliers in order to mitigate modern slavery risks within our operations and supply chain.

2 Structure and operations

Are Media is the principal operating entity within the Are Media Group. We are privately held and have approximately 790 FTE staff (including casuals) across Australia and New Zealand.

Historically a print magazine business (formerly ACP Magazines and then Bauer Media), Are Media is now the leading omnichannel content company for women in Australia and New Zealand. Its thirty nine print and online brands include The Australian Women's Weekly, Better Homes & Gardens, Home Beautiful, Woman's Day, Marie Claire, TV WEEK, New Idea, That's Life, Take 5, Gourmet Traveller, nowtolove.com.au, homestolove.com.au, BeautyHeaven.com.au, BEAUTYcrew.com.au, and ELLE.com.au. E-commerce brands include www.hardtfind.com.au, www.yourhomeandgarden.co.nz, as well as dedicated online marketplace destinations for Home Beautiful and Australian Women's Weekly.

The business' head office is in the Sydney CBD and its main warehouse is in Moorebank, Western Sydney. It has serviced offices in Melbourne and Brisbane, and an office and warehouse in Auckland (Kingsland and Wiri, respectively).

Our core business operations are:

- (a) production, publication and sale of print magazines and cook books through newsagents, supermarkets and transit and petrol and convenience outlets;
- (b) distribution of our own magazines, books and other products to retail outlets;
- (c) distribution services to third parties including third party publishers, as well as suppliers of gifts and stationery;
- (d) production and communication of digital editorial and commercial content across our owned and operated websites;
- (e) management of e-commerce marketplaces on our owned and operated websites;
- (f) conduct of events associated with our brands;
- (g) sale of advertising, sponsorship and affiliate marketing opportunities in connection with our print and digital publications and events;
- (h) sale of content through licensing and syndication;
- (i) digital and print magazine subscription management for our own publications;
- (j) digital and print magazine subscription management services to third parties; and
- (k) Provision of inventory management software and POS integration services to newsagents.

3 Supply chains

Are Media's principal supply chains are as follows.

- (a) Paper from paper mills located in Australia, Europe and China.
- (b) Printing services from printers in Australia and New Zealand, with limited printing services also acquired from printers in China.
- (c) Third party magazines, books and other products from the UK and the United States for distribution in Australia and New Zealand.
- (d) Content (including text, video, images) and trade mark licensing from other publishers, picture agencies and other entities engaged in the licensing of content, which are principally located in Australia, New Zealand, the United States and Europe.
- (e) Services of freelance writers, photographers, videographers, artists, models, stylists and hair and make-up artists who are principally located in Australia or New Zealand.
- (f) Pre-press services from a supplier in India.
- (g) Marketing and retail store merchandising services from suppliers located in Australia and New Zealand.
- (h) Promotional merchandise principally sourced from China, from suppliers principally located in Australia and New Zealand.
- (i) Advertising (where we are advertising our own brands and products outside of our print and digital publications) and production of advertising content from media companies located in Australia and New Zealand.

- (j) Call centre services from suppliers located in the Philippines and Fiji.
- (k) Research services from suppliers located in Australia and New Zealand.
- (l) Standard office equipment, including stationery, IT equipment and office paper from suppliers located in Australia and New Zealand.
- (m) Travel services from travel providers, who are typically commercial airlines, and accommodation providers.
- (n) Logistics and transport (trucking) services from suppliers located in Australia and New Zealand, and shipping of paper and publications (magazines and books) from international destinations such as Asia, Europe and the United States;
- (o) Broadband, web hosting, adtech and SaaS products from suppliers located in Australia, New Zealand, Europe and the USA.
- (p) Telephony, electricity, gas and water supply services from suppliers located in Australia and New Zealand.
- (q) Office commercial cleaning services and waste disposal services from suppliers located in Australia and New Zealand.
- (r) Labour hire services for certain warehouse functions from a supplier in Sydney.
- (s) Professional services, including consulting, financial and legal advisors from suppliers located in Australia and New Zealand.

4 Risks of modern slavery practices in our own operations

Are Media considers that, having regard to the nature and location of our owned and controlled operations, the risk of modern slavery practices within our operations remains low.

The vast majority of our staff and contractors are skilled and well-educated professionals located in Australia and New Zealand and are people with a secure right to live and work in those countries. They are not, therefore, from vulnerable groups where modern slavery is a risk.

Certain members of our warehouse staff and contractors come from culturally and linguistically diverse backgrounds (which may include migrant and refugee backgrounds), and may therefore fall into a higher risk category of workers. The warehouse staff are a mix of permanent employees and labour hire workers sourced from a local labour hire agency under a long-running commercial and trusted relationship. We have a high degree of confidence both with our permanent employee cohort, and with the cohort of labour hire workers, that all relevant employment standards are being met. Our warehouse culture is a relatively flat structure in which queries or concerns from employees and labour hire workers alike are welcomed and addressed appropriately.

More generally, we have appropriate workplace management policies and practices, including grievance procedures, a whistleblower policy, a discrimination & harassment policy, and a Code of Conduct. Along with our experienced and capable managers, supported by our People and Culture and Payroll teams, those policies and practices ensure appropriate recruitment and management of employees, including compliance with minimum remuneration requirements. In

addition, we have well-established relationships and Enterprise Agreements with the two major employee unions relevant to our operations, being the Media Entertainment and Arts Alliance in respect of journalists, and the United Workers Union in respect of our distribution warehouse staff. The warehouse Enterprise Agreement specifically provides that labour hire workers are to be engaged in accordance with the payment terms and conditions of that agreement.

We do not regularly work with children. To the extent that we involve children in photo shoots undertaken by us, we conduct those photo shoots in accordance with regulatory requirements (including those overseen by the NSW Office of the Children's Guardian) and typically engage those children through reputable talent agencies.

5 Risks of modern slavery practices in our supply chains

5.1 General

Are Media considers that, having regard to the nature and location of our operations and the profile of our suppliers, the risk of modern slavery practices remains low in the majority of our supply chains.

As noted at section 3, our suppliers are predominantly located in Australia and New Zealand, being countries with a low risk of modern slavery in the industry in which we operate. Moreover, our suppliers are typically substantial, reputable entities with which we have had long-term relationships and in whom we have a high level of trust.

5.2 Printing services, paper supply and pre-press services

Whilst the majority of printing services to Are Media are supplied by an Australian or New Zealand entity, and paper stock is sourced primarily from mills in Europe (via an Australian supplier), a small proportion of printing services and paper in 2023 were acquired from one or more suppliers in China, which is a higher risk territory for modern slavery practices. However, we have no reason to believe that any of our printing and paper suppliers in China, with whom we have longstanding relationships, are engaging in modern slavery practices.

Our pre-press services are acquired from a supplier in India under a longstanding commercial relationship. We have no reason to believe that our pre-press supplier is engaging in modern slavery practices.

In respect of paper procurement, Are Media has been certified for Chain of Custody under both the FSC® (Forest Stewardship Council) and PEFC™ (Programme for the Endorsement of Forest Certification) schemes since 2010. Both of those schemes include requirements relating to health, safety and labour issues in print and paper supply chains that are based on the ILO Declaration on Fundamental Principles and Rights at Work (1998), including by requiring that certified organisations demonstrate that forced labour is not used. Audits are conducted regularly and in 2023 Are Media's operations were audited under both schemes with a particular focus on involuntary labour, child labour, discrimination and freedom of association. Are Media met all of the audit requirements and remains certified under those schemes.

5.3 Suppliers of gifting & stationery products for onselling

Part of our distribution business is a B2B (business-to-business) service known as The Market Hub. The Market Hub supplies retailers (for the most part newsagencies) with gifting and stationery products which they then sell to their customers. While most of the products are made in China, which may carry an elevated risk of modern slavery, the suppliers of those products are typically based in Australia. We have no reason to believe that any of our suppliers of those goods and services are engaging in modern slavery practices.

5.4 Other suppliers

The supply chains for the following other goods and services acquired by us may carry an elevated risk of modern slavery. We have no reason to believe that any of our suppliers of those goods and services are engaging in modern slavery practices.

- (a) Promotional merchandise and products made in China.
- (b) Call centre services acquired from suppliers in the Philippines and Fiji.
- (c) IT equipment acquired from suppliers in Australia and New Zealand who, in turn, acquire such equipment from overseas suppliers.
- (d) Cleaning services and waste disposal services acquired from suppliers in Australia and New Zealand, but which may employ workers from more high risk categories such as migrants and refugees.

6 Actions taken to assess and address modern slavery risks

Existing position

Are Media has a number of processes and practices in place to assess and address modern slavery risks in our operations and supply chains.

We have in place a whistleblower policy to help deter wrongdoing relating to our operations, by encouraging disclosure of wrongdoing and ensuring that anyone who makes a disclosure can do so safely, securely and with confidence that they will be protected and supported. Eligible whistleblowers under the policy include an individual who supplies goods or services to us (whether paid or unpaid) or an employee of a supplier.

To support the operation of our whistleblower policy, we have adopted a policy regarding modern slavery compliance as part of our Code of Conduct. Within our business, we have People and Culture, Finance, Payroll and Legal professionals whose roles include ensuring compliance with laws and with our processes and policies.

We are a buyer member of Sedex, which is a leading ethical trade membership organisation providing Environmental, Social and Governance consultancy services. Significantly, Sedex works with businesses to improve working conditions in global supply chains. Through Sedex we have access to and utilise a number of tools that assist in tracking information on modern slavery within our supply chains. When engaging with new suppliers in our production and operations divisions, we consider various factors including Sedex membership.

Our standard agreements for the supply of goods and services incorporate provisions relating to ethical supply and modern slavery. Material contracts require sign-off from senior management or our board. That sign-off process includes consideration of risks associated with the contract, such as risks relating to the identity or operations of the counterparty.

Further actions taken in 2023

In 2023 we took the following actions:

- (a) commenced an audit of our key suppliers having regard to quantitative factors such as annual spend, and qualitative factors prioritising higher risk locations and industries. For instance, we looked at pre-press services supplied from India, call centre services supplied from Fiji and the Philippines; as well as the following higher risk sectors: coffee & tea, cleaning services, and promotional merchandise. As at the date of this document, that audit has not identified any compliance issues or areas of concern. The audit is ongoing;
- (b) trained a number of key staff in modern slavery compliance;
- (c) committed to incorporating modern slavery awareness and questions into our new vendor onboarding process, which is expected to be operational in the 2024 reporting year.

7 How the effectiveness of these actions is assessed

Are Media acknowledges that addressing modern slavery risk requires a continuous improvement mindset. Accordingly the measures we have put in place in 2023, as well as the planned measures for 2024, are and will be assessed on a regular basis by our executive leadership team.

In respect of our printing services and paper supply chains, our FSC/PEFC certification (described at section 5.2) gives us significant confidence that we have appropriately mitigated risks of modern slavery in those supply chains. Our business' performance is therefore subject to ongoing independent measurement each year under the annual FSC and PEFC audits.

In respect of our other supply chains, as noted in section 6 above, the supplier audit work is ongoing, and the results of that audit will be made available at the executive level. Should there be any material risks identified with a particular supplier, we will engage with that supplier to understand how these risks can be further mitigated.

In respect of our own operations, having regard to the low risks of modern slavery, the processes we have in place are appropriate to the risk profile of this business. We will continue to assess the effectiveness of these processes on an ongoing basis.

8 Process of consultation with any entities we own or control

As the principal operating entity of the Are Media Group, Are Media has the necessary knowledge and control of the Are Media Group's operations to prepare this statement. To the extent required, the staff of Are Media involved in the drafting of this statement have consulted

with necessary operational areas across the Are Media Group to gather the information relevant to the preparation of this statement.

9 Further steps

We continue to review our processes and practices as they relate to modern slavery risks within our own operations, as well as through our supply chain, on an ongoing basis.

10 Approval

This statement was approved by the Board of Are Media on 23 May 2024.



Jane Huxley
Chief Executive Officer

23 May 2024