

MODERN SLAVERY STATEMENT



ACM

trusted voice

STATEMENT FROM OUR MANAGING DIRECTOR

I am pleased to present ACM's modern slavery statement for 2024.

As Australia's trusted voice in regional media, we pride ourselves on keeping our communities strong, informed and connected. Our company is built on mutual respect for each other, curious minds and a professional manner that is always kind and honest.

Our purpose means ACM recognises the importance of ensuring that we engage in business practices that identify and reduce the risk of modern slavery in our operations and supply chain. ACM is committed to ongoing assessment and monitoring of its modern slavery risks so that meaningful progress in this area can be made.



Tony Kendall
Managing Director

1. INTRODUCTION

This is the Modern Slavery Statement (**Statement**) issued by Rural Press Pty Limited trading as Australian Community Media (ACN 000 010 382) (**ACM**) as the reporting entity under the *Modern Slavery Act 2018* (Cth) (**Act**) for the year to 30 June 2024. It is issued on behalf of ACM and its subsidiaries.

The Statement sets out the actions taken by ACM to address modern slavery risks in our business and supply chain throughout the reporting period.

2. ACM'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

OUR STRUCTURE

ACM is Australia's largest independent publishing company with more than 80 brands reaching 4.1 million Australians online and 2.4 million in print each month.

ACM via a series of wholly owned subsidiaries publishes:

- Regional news publications including *The Canberra Times*, *Illawarra Mercury*, *The Daily Advertiser* (Wagga Wagga, NSW), *The Newcastle Herald*, *The Northern Daily Leader* (Tamworth, NSW), *The Advocate* (Burnie and Davenport, TAS), *The Examiner* (Launceston, TAS), *The Bendigo Advertiser*, *The Border Mail* (Albury and Wodonga), *The Courier* (Ballarat) and *The Warrnambool Standard*.

- Agricultural news and content publications including *The Land* (NSW), *Queensland Country Life*, *Stock Journal* (SA), *Farm Weekly* (WA), *Stock and Land* (VIC) and *Horse Deals* magazine.
- National digital marketplaces and classifieds websites focused on the agricultural sector including *farmbuy.com*, *horsedeals.com.au*, *agtrader.com.au* and *Farmers' Finance Australia*.

OUR OPERATIONS

ACM's key activities include the production and distribution of content, the sale of advertising and marketing solutions, digital marketplaces and classifieds portals, and partnerships and sponsorships across the communities in which ACM operates.

ACM operates across Australia with primary operations in Canberra, Melbourne, Sydney, Newcastle, Launceston, Perth and regional areas of New South Wales, Victoria and Tasmania. ACM employs around 900 staff and our workforce largely consists of qualified Editorial, Sales and Corporate Services staff who are primarily skilled professionals working in Australia.

OUR SUPPLY CHAINS

In FY 23/24, ACM worked with 1,562 direct suppliers. Majority of the suppliers (95%) are located within Australia and range from small family businesses through to global multinationals.

Our supply chains involving direct suppliers

can be broadly grouped as content, goods and products, and services.

CONTENT

- acquires licensed content from suppliers including distributors and news agencies;
- engage freelance writers and contributors who contribute to ACM's published content;
- commissioning advertising including through media agencies and across social media platforms.

GOODS AND PRODUCTS

- purchase of raw product such as ink and paper for ACM's newspaper publishing;
- media/broadcast technology and equipment for the production and distribution of our editorial content and subscription video content (e.g. cameras, editing software, set top boxes, and other such peripherals);
- workplace technology such as hardware, software and cloud services;
- standard office equipment;
- motor vehicles for staff use.

SERVICES

- finance operations such as some payroll, accounts payable and credit functions;
- property services such as maintenance, utilities, cleaning, fire systems, pest control;
- professional services such as legal, tax and accounting;
- corporate travel management services;
- technology services;
- fleet management.

ACM's suppliers are predominantly located in Australia, United Kingdom and USA, which represents more than 97% of ACM's suppliers. These countries are all rated low for prevalence of modern slavery practices and are the countries where governments are taking the most action to address modern slavery on the last available Global Slavery Index¹

3. RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

ACM considers that the risks of modern slavery practices in its supply chain are relatively low when considering the nature of its business operations and geographic location of its operations and suppliers mainly being within Australia.

RISK OF MODERN SLAVERY IN OUR OPERATIONS

ACM's workforce is based in Australia and primarily consists of highly skilled professionals, working mainly in office environments, creating and delivering content for publication or supporting such operations. ACM has a predominantly permanent workforce who have access to their workplace rights and entitlements, are remunerated in accordance with relevant industrial instruments and have the right to freedom of association. Consequently, the risk that ACM causes or contributes to modern slavery in our operations are low.

RISK OF MODERN SLAVERY IN OUR SUPPLY CHAINS

ACM has reviewed the risk of modern slavery practices further down our supply chains by reviewing agreements with our suppliers and their disclosed corporate policies and guidelines, including any publicly available statements relating to actions our suppliers are taking to address modern slavery.

ACM's assessment of our suppliers' modern slavery risks based on our knowledge of their operations and their own assessments of their modern slavery risks is considered low. ACM takes confidence in our suppliers' compliance with the modern slavery prohibitions due to their governance control measures and how they represent themselves in their policies and guidelines in relation to their modern slavery obligations.

ACM is aware that some of our indirect suppliers are based in certain sectors that are recognised as having higher modern slavery risk. Included in those are forestries (paper suppliers) and information technology hardware (electronic equipment, instruments and components). There may also be more remote risks, such as third-party labour hire which ACM may not have visibility over. ACM recognises that modern slavery may occur along our supply chains and will commit to continuously monitoring our supply chains for modern slavery risk in the future.

Whilst ACM has no evidence to suggest that modern slavery practices are occurring in any of our supply chains, we remain committed to taking steps to identify, minimise and prevent instances of modern slavery in our direct and extended supply chains.

¹<https://www.walkfree.org/global-slavery-index/>

4. ADDRESSING THE RISK OF MODERN SLAVERY PRACTICES

ACM is committed to embedding ongoing management processes to identify, prevent, mitigate and account for how we can address actual and potential adverse human rights impacts in our operations and supply chains, including modern slavery.

WORKPLACE POLICIES

ACM currently has policies in place that are applicable to all employees including but not limited to contractors, subcontractors, agents, consultants, temporary staff and volunteers:

- Code of Conduct
- Whistleblower Policy

These policies and procedures promote ethical and legally compliant business conduct to reduce the risks of modern slavery from occurring.

SUPPLIER DUE DILIGENCE

ACM has conducted a review of the modern slavery disclosures of the majority of our largest suppliers (by dollar value), noting not all of them have prepared modern slavery statements. ACM commits to progressively review all of our suppliers' operations and modern slavery disclosures, and to undertake such review on an annual basis.

Consistent with our previous commitments in relation to addressing modern slavery risk, ACM has developed a Supplier Code of Conduct which will be rolled out to existing and new suppliers to ensure ACM's ongoing compliance and governance in relation to, amongst other issues, modern slavery. The Supplier Code of Conduct will set out ACM's expectations in relation to governance and ethics, human rights and labour practices, health and safety, diversity and inclusion, and the environment.

ACM intends to roll out the Supplier Code of Conduct over the next reporting cycle. ACM will undertake ongoing monitoring of our suppliers to ensure they are adhering to the representations made and complying with modern slavery obligations. This will provide us with greater transparency over our supply chain.

OTHER COMPLIANCE ACTIVITIES

ACM has established an Environmental, Social and Governance (ESG) committee and is in the

process of developing its ESG strategy. This compliance activity includes making sure that ACM's suppliers are committed to engaging labour with the appropriate technical skills and experience consistent with industry standards for the production of goods or performance of services.

REMEDIATION

In FY24, ACM has not identified that it has caused, contributed to, or been directly linked to adverse modern slavery outcomes. Accordingly, ACM has not identified any measures that it needed to take, or did take, to remediate modern slavery in its activities or in its direct supply chains.

5. MEASURING OUR EFFECTIVENESS

ACM recognises that a review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

ACM's most recent review of its largest suppliers' modern slavery disclosures did not identify any material risks of modern slavery in their business practices. We commit to progressively review all of our suppliers' operations and modern slavery disclosures, and to undertake such review on an annual basis.

Additionally, ACM has a longstanding Whistleblower Policy under which individuals, including suppliers of goods or services (whether paid or not), can make anonymous whistleblower complaints. ACM has an arrangement with a third-party provider, Stopline, to operate a whistleblower hotline. ACM encourages the reporting of any issue that may adversely affect ACM, its people or reputation and any reportable wrongdoing, including issues relating to modern slavery. No one who reports any suspected wrongdoing in good faith will suffer retaliation or victimisation for making such a report. ACM monitors complaints it receives under its Whistleblower Policy as a measure of its effectiveness in addressing modern slavery risks. In FY24, ACM did not receive any whistleblower complaints relating to modern slavery issues.

6. FUTURE COMMITMENTS

ACM will continue reviewing its operations and supply chain to identify whether there are risks relating to modern slavery which includes working with its suppliers to guarantee compliance with the standards expected under modern slavery obligations.

ACM has developed a Supplier Code of Conduct which we intend to roll out in FY25. The Supplier Code of Conduct will set out ACM's expectations in relation to governance and ethics, human rights and labour practices, health and safety, diversity and inclusion, and the environment.

Additionally, ACM has made its board and senior management aware of our modern slavery obligations and will add modern slavery as an agenda item to our quarterly executive team meetings to ensure there is ongoing visibility and oversight of this issue at a senior level.

ACM will consider over the course of the coming reporting period:

- developing further supplier compliance material and guidance, such as supplier tenders for contract and specific pro forma modern slavery contract clauses;
- conducting risk assessments of suppliers to better identify risk and strengthen our

supplier engagement around modern slavery;

- continuing to review and map out the modern slavery declarations of our suppliers; and
- monitoring and incorporating any changes into ACM's policies and procedures any modern slavery reforms implemented by the Anti-Slavery Commissioner arising from the statutory review of the Act.

7. CONSULTATION & APPROVAL

All ACM subsidiaries operate under a common and consistent governance framework to raise awareness and embed a consistent approach in addressing modern slavery risks in our operations and supply chain. All entities share the same executive leadership team and were consulted in the drafting of this statement.

This statement was approved by the ACM Board of Directors on March 10 2025. This statement is signed by Tony Kendall, Managing Director, on March 11 2025.



Tony Kendall
Managing Director

ANNEXURE

Set out in the table below is where each of the mandatory criteria is addressed in this statement.

Mandatory criteria	Section(s)
a) Identify the reporting entity.	Section 1
b) Describe the reporting entity's structure, operations and supply chains.	Section 2
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Section 4
e) Describe how the reporting entity assesses the effectiveness of these actions.	Section 5
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Section 7
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 6