

Shutterstock's Global Modern Slavery Statement 2025

1. Introduction

Shutterstock Inc. ("**Shutterstock**") is a leading global creative platform offering full-service solutions, high-quality content, and applications for brands, businesses and media companies. Directly and through our group subsidiaries, Shutterstock's comprehensive collection includes high-quality licensed photographs, vectors, illustrations, videos, 3D models and music.

Shutterstock presents its global Modern Slavery Statement. This statement addresses both UK and Australian modern slavery reporting requirements. The statement reflects the integration of Envato Pty Ltd ("**Envato**") and its subsidiaries following its acquisition by Shutterstock on 22 July 2024.

2. Combined Reporting Approach

Following the acquisition of Envato by Shutterstock on 22 July 2024, this combined Modern Slavery statement addresses the compliance requirements under the Australian *Modern Slavery Act 2018* (Cth) for Shutterstock and Envato's Australian entities (outlined in section 4) and Shutterstock's UK requirements under section 54 of the Modern Slavery Act 2015. This single comprehensive statement provides transparency regarding Shutterstock's global operations, ensuring that all relevant stakeholders have access to consistent information about modern slavery risk management practices across the entire organization, while meeting the specific reporting requirements of each jurisdiction.

From an Australian perspective, this statement covers an 18-month reporting period, encompassing Envato's activities from 1 July 2024 to 31 December 2025 due to a change of financial reporting period to calendar year ends for Envato commencing on 1 January 2025. This change in reporting period allows Envato to align with Shutterstock's financial reporting period.

3. UK MODERN SLAVERY STATEMENT (Made pursuant to section 54 of the UK Modern Slavery Act 2015)

In this section 3, 'we' refers to Shutterstock Inc. including all of Shutterstock's subsidiaries and affiliates worldwide, excluding those discussed in Section 4.

3.1 Introduction and Company Overview

Shutterstock is a leading global creative platform, empowering millions of creators and businesses worldwide with high-quality creative content and innovative tools. As a technology-driven company serving diverse markets across the globe, we recognize our responsibility to combat modern

slavery and human trafficking throughout our operations and supply chains. This statement outlines our commitment to ethical business practices and our ongoing efforts to identify, prevent, and address any risks of modern slavery within our sphere of influence.

3.2 Structure and Business Operations

The Shutterstock Group operates through multiple subsidiaries and entities across various jurisdictions, with headquarters in New York and offices worldwide. Our business model encompasses creative content licensing, stock photography and video, music licensing, custom content creation, and AI-powered creative solutions. We maintain relationships with millions of contributors globally who provide creative content through our platform, as well as enterprise customers and individual subscribers who license our content for their creative projects. Shutterstock's in-house Studios team creates bespoke content and we also distribute content licensed from partnerships with agencies as well as production and media companies. Shutterstock has vendor relationships with external suppliers to provide employee benefits and facilities as well as vendors who provide financial, legal and technological services and solutions.

3.3 Commitment to Ethical Standards

Shutterstock is committed to conducting business with integrity and respect for human rights. We have zero tolerance for modern slavery, forced labor, human trafficking, and child labor in any form. Our commitment extends beyond our direct operations to encompass our entire value chain, including suppliers, contractors, business partners, and the creative community that contributes content to our platform. We actively work to ensure that all individuals involved in our business ecosystem are treated with dignity, respect, and in accordance with applicable labor laws and international human rights standards.

3.4 Policies and Governance Framework

Our Code of Conduct and Business Ethics serves as the foundation for our anti-slavery efforts, establishing clear expectations for all employees, contractors, and business partners. This framework prohibits the use of forced labor, human trafficking, and exploitative practices. Additionally, we maintain a confidential whistleblower program that enables anonymous reporting of concerns without fear of retaliation.

3.5 Risk Assessment and Due Diligence

While Shutterstock views our industry and the majority of our suppliers as low-risk, we employ a systematic risk-based approach to identify and assess modern slavery risks across our operations and supply chains. We seek to mitigate the risk of modern slavery occurring by:

- Ensuring all employees have the right to work in the relevant territory in which they are employed and ensuring we comply with all local legal requirements in those territories;
- Include contractual provisions in all relevant documentation with external suppliers, contributors, contractors and agencies to ensure compliance with all applicable laws, including modern slavery and anti-trafficking legislation;

- Collaborate with vendors and customers to respond to their own due diligence processes accurately and comprehensively;
- Protect whistleblowers and those who raise concerns or grievances by employing a dedicated whistleblowing hotline as well as ensuring HR advice and support;
- Review our supplier audit program to include modern slavery.
- Our content creation guidelines and external party agreements include language to ensure all of our employees, suppliers and partners engage with and abide by all relevant anti-slavery and human trafficking laws in relation to the services provided.
- Shutterstock's Studios business engages in content creation, both in-house and via partnerships with external production and media partners. We ensure all required permits and authorizations are in place when we create and distribute content including minors.

3.6 Training and Awareness Programs

Our internal Code of Conduct and Business Ethics reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Shutterstock's employees must read and accept the Code of Conduct and Business Ethics as part of Shutterstock's annual compliance training. Our training covers identification of modern slavery indicators, reporting procedures, and appropriate response protocols.

3.7 Effectiveness Measurement and Continuous Improvement

We review our global practices annually to ensure we mitigate any risk of non-compliance with the Modern Slavery Act. We continue to encourage and facilitate conversations throughout our supply chains to ensure any areas of risk or non-compliance are effectively identified and resolved.

4. AUSTRALIAN MODERN SLAVERY STATEMENT

On 22 July 2024, Envato was formally acquired by Shutterstock, a company incorporated in the United States of America. Shutterstock is now the ultimate parent company of Envato. As a result, this statement is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) for the 1 July 2024 to 31 December 2025 period (18-month period) as it relates to the United States financial year ending 31 December ("**Extended Period FY24-25**").

4.1 Reporting Entity & Structure

When we say 'Envato' or the 'Envato Group' throughout this section 4, we're referring to **Envato Pty Ltd ACN 119 159 741** (which is the reporting entity under the *Modern Slavery Act 2018* (Cth)) and its following Australian subsidiaries: Envato Elements Pty Ltd ACN 613 824 258, Envato Placeit Pty Ltd ACN 622 496 520, Envato Sites Pty Ltd ACN 613 823 877, Snowcap Labs Pty Ltd ACN 671 313 394, Envato Ventures 2 Pty Ltd ACN 671 314 453, Envato Twenty20 Pty Ltd ACN 632 661 744 and Envato Foundation Pty Ltd ACN 626 194 269.

Following the acquisition by Shutterstock, the following entities are also included as part of Shutterstock's Australian group and considered reporting entities under the *Modern Slavery Act 2018* (Cth) for this reporting period:

1. **SHUTTERSTOCK Aus Company Pty Ltd ACN 672 062 369**
2. **SHUTTERSTOCK Aus Emu Pty Ltd ACN 676 934 599**

In this section 4, 'we' refers to Envato, the 'Envato Group' and Shutterstock's Australian entities outlined above only.

All entities listed above are party to a deed of cross guarantee and consolidated for financial purposes. However, the substantive operations relevant to modern slavery risk assessment are undertaken by the Envato Group, and therefore this section 4 focuses primarily on Envato's operations and supply chains.

Envato Group Structure

Envato is an Australian proprietary company with its principal place of business in Melbourne, Australia. In the 1 July 2024 to 31 December 2025 period, Envato had approximately 762 people with the majority across Australia, Mexico, the United States, New Zealand, UK and the EU.

Envato has previously published its Modern Slavery Statement for the Australian financial year from 1 July 2023 to 30 June 2024 ("FY24") ("**Envato Group Modern Slavery Statement 2024**") which is available on our website.

4.2 Operations and supply chain

Our FY24-25 operations

Envato's business is built on the licensing of creative digital assets and tools to a global community of users. Our community visits Envato to buy and sell creative digital assets, use smart digital design templates, learn creative skills and hire creative freelancers.

Envato owns and operates a number of platforms and websites: **Envato Elements** (a subscription service for digital creative content), **Envato Market** (an online marketplace for digital creative content), **Placeit by Envato** (an online tool for the creation of branding and marketing assets), **Envato Tuts+** (an online educational platform for the digital creative industry), and **Mixkit** (a stock video licensing service). We also run Empowerkit which provides SEO services for franchisees.

Our supply chain

Envato purchases goods and services required for our business operations. Our tier 1 suppliers are predominantly skilled independent consultants or contractors, goods and services for our offices, software and SaaS tools and hardware supply. We also have a global community of professional freelance creatives who contribute creative digital content to our sites.

4.3 Identifying the risks of modern slavery practices in our operations and supply chains

Given the nature of our industry, being creative and digital, and the types of goods and services we primarily procure, we consider our operations continue to be low risk for modern slavery practices. Envato is not currently aware of the presence of modern slavery in any tier of our supply chains.

However, we acknowledge that modern slavery practices can exist deep within supply chains, and we recognise that the following goods and services within our supply chains may continue to represent a comparatively higher risk of modern slavery:

- supply of textiles, apparel and other branded merchandise products;
- office furniture and supplies;
- office cleaning services;
- offshore consulting services;
- supply of food and beverage;
- catering services;
- supply of computers, electronics and related hardware;
- shipping and logistics; and
- office plant supply.

Accordingly, we continue to take our responsibilities seriously in respect of all workers in our operations and supply chains. We will continue to monitor the risks in our supply chains for future reporting periods.

Envato does not tolerate modern slavery practices, and will take immediate action if we have reasonable grounds to believe that there is modern slavery within our supply chain. Upon investigation, our actions may include immediately terminating contracts with the relevant supplier if the modern slavery risk identified is not remediated.

4.4 Actions taken by Envato to assess and address the risks of modern slavery in our supply chain and operations

Envato's values

Envato is a values-driven business, committed to balancing purpose and profit in a sustainable way. These values are prominent in all levels of our day-to-day operations, and cover:

1. Community Spirit
2. Build our Future
3. Make it Happen
4. Embrace Diversity

5. Make Envato Proud

Being accountable to our values of “Community Spirit” and “Make Envato Proud” is of particular importance to Envato for addressing modern slavery risks, as these values require us to be fair, consistent and ethical in everything we do, even if this comes at the expense of profit.

Policies and Procedures

Envato is continually working to ensure that its employees and suppliers are aware of and compliant with applicable laws and policies relating to modern slavery and human rights. In the Extended Period, the following policies were in place:

- A public-facing Modern Slavery Policy (<https://www.envato.com/slavery-policy/>)
- A public-facing Whistleblower Policy (<https://www.envato.com/whistleblower-policy/>) which is applicable to our employees, contractors and other third parties that may have information to share.
- A public-facing Supplier Code of Conduct (<https://www.envato.com/envato-supplier-code-of-conduct>) which is applicable to all suppliers that provide goods and services to Envato and its affiliates
- A public-facing Anti-Bribery and Corruption Statement (<https://www.envato.com/anti-bribery-and-corruption/>) that sets out Envato’s approach to compliance with applicable anti-bribery and corruption laws and regulations, and our expectations of our employees, affiliates, customers and contributors.

As Envato is part of the Shutterstock global group, its employees and suppliers are also covered by Shutterstock group policies including:

- A public-facing Code of Business Conduct & Ethics (<https://investor.shutterstock.com/static-files/92180647-4a88-41ab-a6d1-ea12d8bcb363>)
- A public-facing Anti-Corruption Policy (<https://investor.shutterstock.com/static-files/1db4f791-d29c-42e1-9c0f-83f1cb916f95>).

Envato employees are required to complete compliance training as part of their onboarding to ensure they are familiar with the applicable Whistleblower policy, including how to make a disclosure if they have information regarding misconduct or modern slavery within the business. Envato disclosures are accepted anonymously via our whistleblowing hotline, managed by our service provider, **YourCall**. Envato also maintains the confidentiality of the individual (subject to applicable laws set out in our policy). Disclosures undertaken by employees of Shutterstock are accepted anonymously via **Speakfully Now**.

Precedent legal clauses related to compliance with modern slavery law are now well established for use in relevant supplier contracts, to ensure we are taking the appropriate steps to mitigate the risk of engaging a supplier with modern slavery practices.

Envato's actions and next steps

Envato continues to work to manage and mitigate the risks of modern slavery in our operations and supply chains. The business is responsible for making sure that our employees, contractors and other third parties comply with Envato's policies and act at all times in accordance with Envato's values.

Actions in the Extended Period FY24-25

In the Extended Period FY24-25, we conducted a specific program of compliance training for new and existing employees and managers to ensure they are familiar with Envato's policies on anti-bribery and corruption, insider trading and whistleblower disclosures, and to address evolving compliance requirements throughout the full 18-month period, giving particular focus to anti-bribery and corruption and anti-money laundering activities to ensure compliance with recent amendments to Australian anti-bribery legislation and to maintain best practices over the entire Extended Period FY24-25.

The implementation of Ethixbase's systems continue to help streamline our contract approval processes with various stakeholders across the business, and helps to manage and automate the distribution, follow up and review of modern slavery questionnaires to vendors who meet relevant thresholds as part of the risk assessment of that vendor. The system has also improved our reporting capability to provide a real time picture of modern slavery risks in our supply chain.

Our consultation process encompasses engagement with employees, suppliers, industry partners, and relevant civil society organizations to ensure comprehensive identification and assessment of potential modern slavery risks across our operations and supply chains. For example, Envato collaborated with Ethixbase to recalibrate its Modern Slavery and Sanctions screening processes. This update ensured that the latest data from the Country Corruption Perceptions Index (CPI), Global Slavery Index (GSI), and S&P Risk Atlas scores were incorporated when assessing new vendors.

Envato has also sought to iterate and develop its modern slavery practices. During the period, Envato developed a modern slavery questionnaire to provide to high risk vendors where the risk could not be remediated via Ethixbase resources or additional research. Envato is currently working on implementation and rollout in 2026, including the preparation of internal standard operating procedures guides.

Next Steps

In 2026 (the **CY26 Period**), Envato will maintain a strong focus on compliance, and continue to monitor modern slavery legislation and work on additional appropriate measures to mitigate any modern slavery risks that may be identified. One key initiative will be the implementation and rollout of Envato's modern slavery questionnaire.

Envato will continue to incorporate modern slavery risk considerations into its enterprise risk management framework, ensuring that risks identified through supply chain due diligence and

compliance reviews are reflected in the organisation's central risk register and reviewed at regular intervals by Envato's leadership.

We will also continue to conduct refresher training on modern slavery, anti-bribery and corruption, insider trading and whistleblower disclosures for our managers and employees and provide our employees with up to date information on modern slavery laws, actions and procedures (for example, on our company intranet, onboarding packets and other company channels).

As part of our compliance focus, we will continue to look more closely at environmental, social and governance (ESG) legislation and activities, particularly in respect of climate and carbon reporting, which may include review of Envato's ESG activities, and developing an action plan that organises those activities under the relevant climate-related disclosure requirements. In addition, as part of ESG focus, we will continue to build on our existing diversity and inclusion initiatives, and internal governance and risk management frameworks.

4.5 Assessing the effectiveness of our actions

Envato recognises the importance of regularly evaluating the effectiveness of our modern slavery risk management approach. Our assessment methodology focuses on measuring both the implementation and impact of our policies, procedures, and supplier engagement initiatives.

During the Extended Period FY24-25, we conducted quarterly reviews of our supplier onboarding processes and annual assessments of our due diligence procedures. These reviews confirmed that our current risk assessment framework remains appropriate for our business model and supply chain profile, with no instances of modern slavery identified through our monitoring activities.

Following our acquisition by Shutterstock, we initiated a comprehensive review of our modern slavery policies to align with Shutterstock's global compliance standards and best practices. This integration process will enhance our ability to identify and address potential risks across our expanded operational footprint while maintaining our commitment to ethical business practices.

We measure the effectiveness of our actions through several key performance indicators, including supplier response rates to our due diligence questionnaires, completion rates of modern slavery training for relevant team members, and the frequency and quality of our supply chain risk assessments. For future reporting periods, we will continue to refine our measurement approach and reporting frameworks to ensure they remain aligned with emerging best practices and regulatory expectations.

4.6 Consultation process

Consolidated Group

During the Extended Period FY24-25, we actively engaged and consulted with all companies in the Envato Group in the development of this statement (entities outlined in Section 4.1 above). The details of the modern slavery reporting requirements; information regarding the actions Envato

intends to take to address these requirements and any other relevant materials and updates were provided. Additionally, procurement is consolidated across the Envato Group, and our modern slavery procedures apply to the Envato Group as a whole. Common management across the Envato Group with respect to procurement practices ensures that the processes, policies and procedures referred to in this statement are adopted by each of the Envato Group Companies without the need for formal consultation between the companies.

Consultation with Stakeholders

Envato is committed to meaningful consultation with stakeholders on modern slavery risks and mitigation strategies. We conduct regular internal consultations with our procurement, legal, and human resources teams to review and update our modern slavery risk assessment frameworks. Additionally, we engage with external stakeholders, including vendors such as Ethixbase and industry associations to stay informed about emerging risks and best practices in modern slavery prevention. This collaborative approach ensures that our policies and procedures remain current and effective in addressing evolving challenges in our global supply chains.

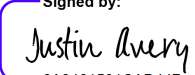
Following our acquisition by Shutterstock, we have enhanced our consultation processes to align with Shutterstock's broader corporate governance frameworks while maintaining our commitment to transparent and inclusive stakeholder engagement. This integrated approach strengthens our collective capacity to identify, assess, and address modern slavery risks across both organizations' combined operations and supply networks.

5. APPROVAL

This joint statement is made:

1. pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Shutterstock's anti-slavery and human trafficking statement for the year ending December 2025.
2. pursuant to the Australian *Modern Slavery Act 2018* (Cth) and constitutes Shutterstock's (including Envato) modern slavery statement for the 18 month period 1 July 2024 to 31 December 2025.

Approved by the Board of Directors of Shutterstock Aus Company Pty Ltd on behalf of the Australian entities by way of circular resolution dated 14 May, 2026.

Signed by:

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Justin Avery
Director
Envato Group