

MODERN SLAVERY STATEMENT



ACM
trusted voice

Introduction

This is the first Modern Slavery Statement issued by Rural Press Pty Limited trading as Australian Community Media (ACM) - ABN 47 000 010 382 and covers the activities of ACM and all of its subsidiaries as at 30 June 2020.

The statement has been made in compliance with the Modern Slavery Act 2018 (Cth) (Modern Slavery Act).

OUR BUSINESS

ACM is Australia's largest privately owned media company. ACM is made up of more than 200 leading rural and regional newspapers and community-based websites. Combined they serve 6.9 million readers every month in every state and territory across Australia and employ around 1,500 staff. More recently, ACM and realestateview.com.au have formed a joint venture to build a market-leading, multi-faceted property media and data business.

OUR SUPPLY CHAIN

ACM's supply chains for products and services include:

- Raw materials such as ink and paper
- Technology such as hardware, software and cloud services
- Finance operations such as some payroll, accounts payable and credit functions
- Advertising including media agencies and social media platforms
- Property services such as maintenance, utilities, cleaning, fire systems, pest control
- Distribution
- News Agencies
- Professional services such as legal, tax and accounting
- Corporate travel management services
- Fleet management

OUR OPERATIONS

ACM's 1,500 employees are primarily skilled professionals working in Australia, which means the positions they hold are less vulnerable to slavery or human trafficking. ACM's Human Resources team have processes in place to ensure that all ACM employees have access to their workplace rights and entitlements in Australia and are remunerated in accordance with appropriate legislation.

ACM's workforce largely consists of qualified Editorial, Sales and Corporate Services staff employed throughout its 200 leading news media brands across Australia such as The Canberra Times, Newcastle Herald, The Border Mail, The Bendigo Advertiser and The Land.

In FY 20/21, ACM worked with 1694 direct suppliers. Majority of the suppliers (98%) are located within Australia and range from small family businesses through to global multi-nationals.

POTENTIAL RISKS 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. Approximately 2% of ACM's direct suppliers in FY 20/21 are located overseas.

ACM makes every effort to ensure its suppliers respect human and labour rights and comply with modern slavery obligations. ACM has reviewed the risk of modern slavery practices further down its supply chains by reviewing agreements with its suppliers and their disclosed corporate policies and guidelines, including the labour practices within its raw material suppliers and third party providers of services such as technology and finance operations.

ACM takes confidence in its 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, which for instance, build on the United Nations Guiding Principles on Business and Human Rights. This compliance 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. Even though ACM considers that the risks of modern slavery practices in its supply chain are relatively low, it recognises that modern slavery may occur in its organisation and supply chains and will commit to continuously monitor our modern slavery risk in the future.

ADDRESSING THE RISK OF MODERN SLAVERY PRACTICES

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

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 that promote ethically and legally compliant business conduct, including:

- Code of Conduct Policy
- Whistleblower Policy. ACM's well established Whistleblower Policy covers both employees and ACM suppliers of goods or services (whether paid or not).

MEASURING OUR EFFECTIVENESS

ACM does not currently assess its effectiveness in addressing modern slavery practices, given the relatively low risk of modern slavery practices which have been identified to date. However, we recognise there is more to do to assess the effectiveness of our actions in managing modern slavery risk and will continue to evolve our approach in 2020-21. For example, adding modern slavery as an agenda item to our quarterly executive team meetings and closely monitoring the number of new supply agreements that have ACM's new terms stating compliance with modern slavery obligations.

COMPLIANCE

All entities reporting into Rural Press Pty Limited 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 have contributed in the drafting of this statement.

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 will consider over the course of the coming reporting period:

- introducing new terms to be included in all new supply agreements or contracts that state their compliance with modern slavery obligations.
- the central Procurement team proactively consult with those suppliers to ensure they are adhering to the representations made and complying with modern slavery obligations.

This statement was approved by the Board of Rural Press Pty Limited.



Antony Catalano
Executive Chairman

