



OVATO

**Ovato**  
**Modern Slavery**  
**Statement**  
**FY2020**

## Our vision

**We are creating a smarter and sustainable business to deliver integrated marketing solutions that turn audiences into customers.**



# About Ovato

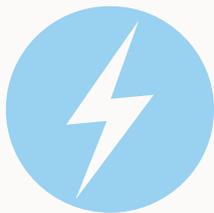
We are Australasia's largest integrated media solutions provider.

With a rich history spanning more than 150 years, we have demonstrated our ability to adapt to changing market conditions and evolving technologies to remain relevant.

We have deep experience of all parts of the marketing mix and a unique understanding of traditional and contemporary marketing channels, and the powerful impacts these can deliver when strategically aligned.

We turn **audiences** into customers.

## Whether you use one service or the infinity of our offering, we promise:



Smart solutions that get you to market faster.



Data-driven insights drive measurable success for every campaign.



Maximise impact across marketing activities with integrated solutions.

# Ovato structure, entities, operations and supply chains

The Ovato group structure, entities, operations and key supply chains are detailed below. See Table 1.0.

Table 1.0 Ovato structure, entities, operations and supply chains

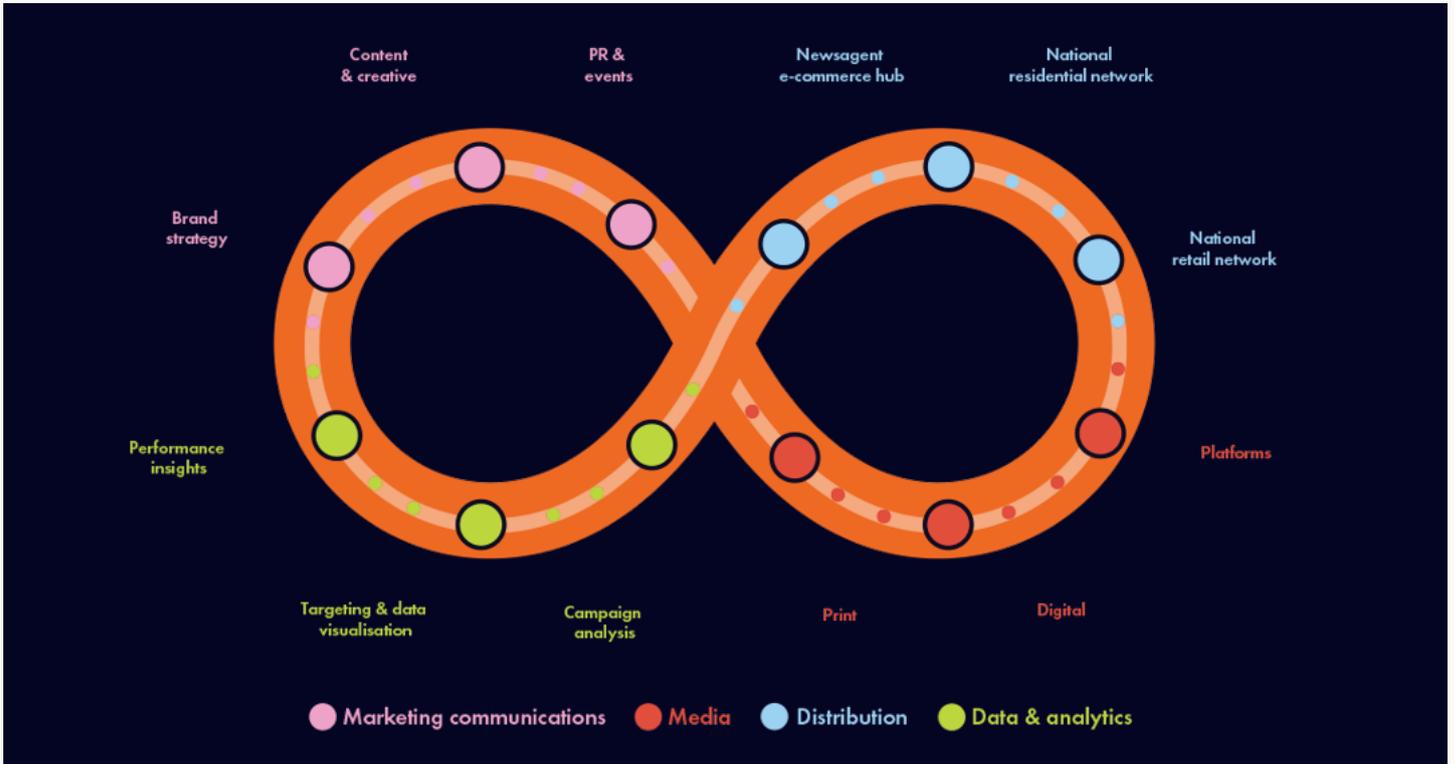
Structure/ entities	Operations	Supply chains
<p>Ovato Limited is an ASX listed entity</p>	<p>Ovato Limited is the largest printer and distributor of catalogues, magazines and marketing materials in Australasia. We are building on this foundation with data, technology and new solutions to meet and lead the needs of marketing at retail scale.</p> <p>Our group capabilities include print and distribution, marketing communications, data-driven marketing and customer analytics, customer modelling, geospatial analysis, photography, retouching, computer generated imagery, pre-media and production, digital asset management, automated workflow solutions, creative direction and design and book printing.</p> <p>We work with some of Australia and New Zealand's most recognised retail, publishing and corporate brands to effectively produce and deliver marketing and turn audiences into customers.</p>	<p>Our suppliers are generally located into 1 of 4 regions:</p> <p><b>1. Australasia/Oceania:</b></p> <ul style="list-style-type: none"> <li>• Australia</li> <li>• New Zealand</li> </ul> <p><b>2. Europe:</b></p> <ul style="list-style-type: none"> <li>• Finland</li> <li>• Sweden</li> <li>• Germany</li> <li>• Netherlands</li> <li>• Norway</li> </ul> <p><b>3. North America</b></p> <ul style="list-style-type: none"> <li>• USA</li> <li>• Canada</li> </ul> <p><b>4. Asia</b></p> <ul style="list-style-type: none"> <li>• Japan</li> <li>• Korea</li> <li>• China</li> </ul>
<p>Ovato Limited includes Ovato Australia and Ovato New Zealand</p>	<p>The Company's business segments are primarily in pre-media, printing and distribution of publications including catalogues, magazines, and book.</p> <p>Ovato's paper Procurement Policy requires that all paper used by the company is sourced in a sustainable and responsible manner consistent with recognised international standards. This Policy enables our customers to have a high level of confidence in the sustainability of their printed communications. Our paper is manufactured under ISO14001 complaint environmental management System.</p>	<p>The main types of goods and services Ovato procures are:</p> <ul style="list-style-type: none"> <li>• Paper</li> <li>• Ink</li> <li>• Logistics</li> <li>• Aluminium plates</li> <li>• Energy</li> <li>• Press consumables such as stitching wire, glues and silicon</li> <li>• Material handling equipment such as forklifts &amp; pallet movers</li> </ul>

Structure/ entities	Operations	Supply chains
	<p>We operate in Australia, NZ, India and England.</p> <p>We have Print sites in NSW (Warwick Farm), Qld (Geebung and Cairns), WA (Bibra Lake), SA (Salisbury South). We also have pick and pack centre in NSW (Moorebank).</p> <p>We have combined offices, Print and Distribution Sites in NZ (Christchurch and Auckland).</p> <p>We have distribution Centres in NT (Darwin), Qld (Hendra) and Tas (Hobart).</p> <p>We have offices in NSW (Frenchs Forest, Silver Water and Pymont).</p> <p>We have marketing and creative studios in Qld (Geebung) and NSW (Silverwater and Pymont) and Vic (Clayton).</p> <p>We also have creative studios in Chennai, India. We have a sales office in London, England - linked to our creative business.</p>	<p>Are goods and services are sourced from the following locations:</p> <p><b>Australasia/Oceania:</b></p> <ul style="list-style-type: none"> <li>• Australia</li> <li>• New Zealand</li> </ul> <p><b>Europe:</b></p> <ul style="list-style-type: none"> <li>• Finland</li> <li>• Sweden</li> <li>• Germany</li> <li>• Netherlands</li> <li>• Norway</li> </ul> <p><b>North America:</b></p> <ul style="list-style-type: none"> <li>• USA</li> <li>• Canada</li> </ul> <p><b>Asia:</b></p> <ul style="list-style-type: none"> <li>• Japan</li> <li>• Korea</li> <li>• China</li> </ul>
<p>Ovato Limited ACN 050 148 644</p>	<p>Ovato enjoys many long-standing relationships with its major suppliers.</p> <p>Ovato deals with numerous suppliers and prefers to engage in long-term relationships who understand the nuances of what we do. The majority of agreements run for 12 months after which we either go out to tender or re-negotiate new terms.</p>	
<p>Head Office: Level 4, 60 Union Street Pymont NSW 2009</p>	<p>Approximate number of employees across the entire group = 923.</p>	

# Ovato solutions

The Group services are detailed in the solution infinity below and are comprised of 12 'stops' under 4 arcs. See Figure 1.0

Figure 1.0 Ovato solutions infinity



# Ovato business locations

Ovato have representation in every Australian State and Territory. Internationally there are offices in NZ, the UK and India. See Figure 2.0.

Figure 2.0 Ovato business locations



# Our commitment to ethical sourcing and modern slavery

The **Ovato Ethical Sourcing and Modern Slavery Policy** outlines our commitment towards best practice.

Ovato strives to ensure the goods and services sourced, are done so in a responsible manner as we believe in earning the trust of all our stakeholders by doing the right thing for our people, our clients, our customers and our general community.

The **Ovato Ethical Sourcing and Modern Slavery Policy** is based on the International Labour Organisation (ILO) conventions and the Modern Slavery Act 2018.

Ovato recognises that modern slavery is a growing and complex problem, and aims:

- To integrate an ethical and socially responsible business practice by collective commitment and responsibility; and
- To be working with all our stakeholders to fulfil this common goal of ending modern slavery. We expect our suppliers to support the ethical standards set out in this policy about workplace safety, environment, and fair pay and employment conditions. This encompasses:
  - Forced or bonded labour (labour rights)
  - Freedom of association, grievance mechanisms and recourse
  - No child labour
  - Wages and benefits
  - Working hours
  - No discrimination/no harassment or abusive treatment of workers
  - Provision of safe and hygienic workplaces
  - No bribery
  - Subcontracting of work
  - Environmental compliance
  - Animal welfare
  - Use and treatment of migrant workers
  - Hiring and regular employment

The **Ovato Code of Conduct** outlines the principle of good corporate governance as the basis for ongoing practices. Under these Principles Ovato is required to adopt a code of conduct to which it adheres to in its business dealings and its general behaviour. Ovato's reputation is founded on such dealings and behaviour, as well as the conduct of each of our employees and contractors. These principles are required to be demonstrated through all dealing and across the end-to end supply chain.

Principally the code covers:

1. Ovato's employment practices
2. Compliance with legislation
3. Management of potential conflicts of interest

#### 4. Managing Third Parties and the environment

- a. Public and political activities
- b. Community and environment
- c. Dealing with suppliers

#### 5. Administration

- a. Reporting
- b. Whistle-blower line and access
- c. Failure to comply.

The **Ovato Respectful Workplace Policy** outlines our commitment to maintain safe and positive working environments. As an equal opportunity employer Ovato is committed to providing a workplace free from discrimination, sexual harassment, bullying, victimisation and violence.

Ovato proactively manages its processes to provide a fair workplace by:

- Reviewing and communicating clear policy positions on expected standards of behaviour
- Providing training to raise awareness, educate on responsibilities and develop skills
- Taking prompt action on resolving grievances/complaints and unacceptable behaviour
- Initiating disciplinary action for bullying, harassment, violence, victimisation, and vexatious claims, and
- Managing processes for reporting unacceptable behaviours and auditing those processes.



All suppliers are expected to meet our standards outlined in our policy across the following areas:

- Unlawful discrimination
  - o Direct discrimination
  - o Indirect discrimination
- Sexual harassment
- Bullying
- Violence
- Victimisation
- Responsibilities of all individuals

In addition to the policies already outlined, Ovato has other policies to help guide and direct employees and managers in their employment.

Applicable policies include:

- Environment Policy
- Domestic Violence Policy
- Health and Safety Policy
- Quality Policy
- Parental Leave Policy
- Flexible Working Policy
- Media and Communications Policy
- Interstate Relocation Policy
- Temporary Skill Shortage/Sponsorship Policy
- Employee Redeployment and Redundancy Policy.

## **Our approach to managing modern slavery risks within Ovato**

In addition to ensuring that Ovato's policies and procedure are communicated, understood, and complied with, we ensure that:

- All our legal obligations are complied with in the advertising, recruitment, selection and onboarding/ induction of all employees or potential employees.
- Any and all individuals who are offered employment within Ovato are free to accept said employment, have the rights to employment (in that country), and are able to terminate the employment relationship -under their own free will.
- All passports and supporting documentation provided by employees in support of their identity and working rights, are returned. We do not hold any original documents within the company.
- All employees are provided a contract of employment detailing their terms and conditions of employment including rates of pay and benefits.

# Our assessment of risks of modern slavery practices within Ovato and its' supply chains

## Internally

We constantly review our policies and practices to ensure we are compliant with legislation and do not practice or condone any behaviour that causes, contributes to, or directly links modern slavery to Ovato.

Any matters raised by employees or other persons, either via the 'whistle-blowers' hotline or through normal business relationships are reviewed and independently investigated, in line with policy and practice. There is no penalty for raising any concern. Remedial actions are implemented, as necessary.

## Externally

We have undertaken a comprehensive mapping of our end-to-end supply chain and believe that the risk of modern slavery in our supply chain is relatively low.

We have provided copies of the **Ovato Ethical Sourcing and Modern Slavery Policy** and have required our supplier to confirm their adherence to our policy.

As we enjoy long relationships with our suppliers, we have significant data and prior experience on which to base our understanding.

We are keen to work with our distribution providers (logistics partners) to ensure all risks are assessed and processes are in place to mitigate risks going forward. We will work to support these suppliers to check how they are progressing on any actions they have put in place to address modern slavery risks.



# How we assess the effectiveness of actions being taken to address modern slavery risks

1. We are in the process of establishing an annual review of Ovato's response to modern slavery.

This review will be conducted by senior managers from across the major functions of the entity. The outcome of the annual review will be provided to the Executive and Board.

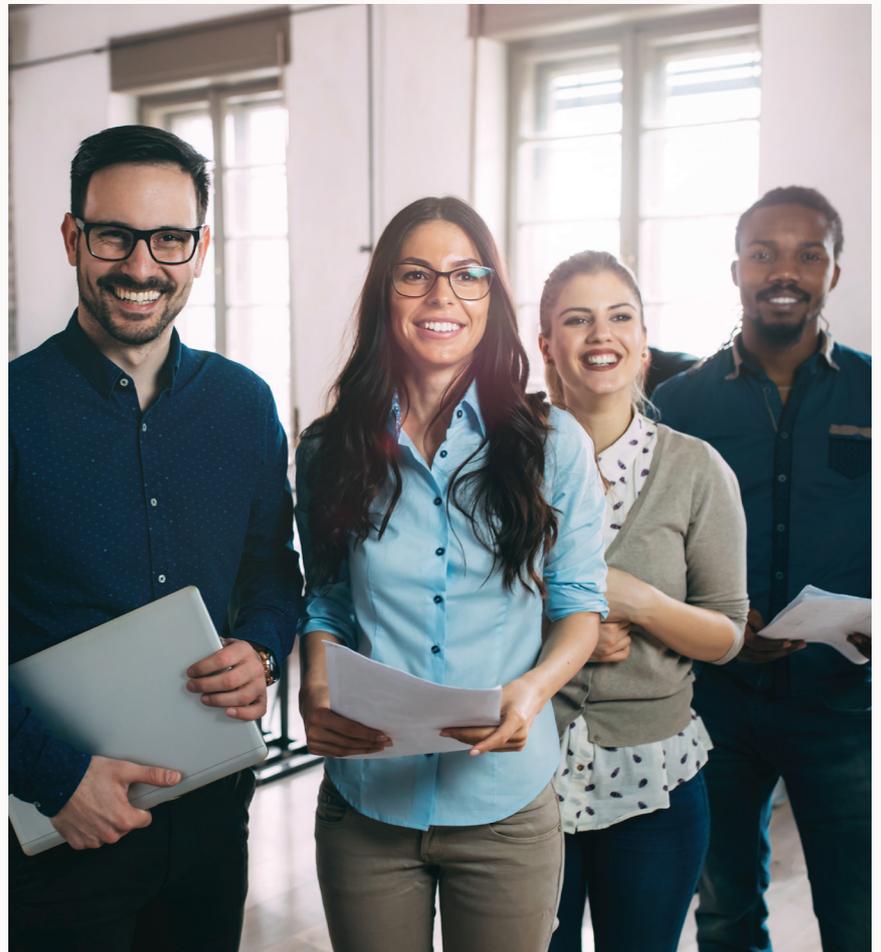
2. We plan to complete training for all employees over the next 12 months - to ensure that they are aware of modern slavery risks, and what to do in the event of being made aware of any such risk being present within Ovato operations.
3. We will focus on awareness raising and training with our suppliers to improve supplier awareness of modern slavery risks, within their own supply chains and provide insight into how they may contribute to Modern Slavery.

## Further steps

1. We will review our contractual processes with our suppliers and their supply chains.

This may include:

- Regular monitoring and reporting
  - Introducing new contractual terms
2. We will continue to build our internal focus and depth of understanding around this topic for our employees and shareholders.





**O V A T O**

This Statement was approved by the Board of Ovato following review by the directors.

Michael Hannan

Chairman

Dated 22 June 2021