



Modern Slavery Statement

For the year ending 31 December 2024

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 2024. It is made on behalf of Are Media and its related bodies corporate (**Are Media Group**).

Are Media recognises that as the world continues to evolve, becoming ever more connected via trade channels while at the same time facing serious threats to its stability through ongoing armed conflict and the risks posed by climate change, it remains vital that businesses take a leadership position in addressing modern slavery risks. Eradication of modern slavery is a collective responsibility of business, government and individuals. A major way in which businesses such as Are Media 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 its people and its 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 its operations and supply chain.

2 Structure and operations

Are Media is the principal operating entity within the Are Media Group. It is privately held and has approximately 750 FTE staff (including casuals) across Australia and New Zealand.

Historically a print magazine business (formerly ACP Magazines and then Bauer Media), Are Media is the leading omnichannel content company for women in Australia and New Zealand. Its print and online brands include The Australian Women's Weekly, Better Homes & Gardens, Home Beautiful, Woman's Day, Marie Claire, ELLE, TV Week, New Idea, That's Life, Take 5, Gourmet Traveller, nowtolove.com.au, homestolove.com.au, BeautyHeaven.com.au and BEAUTYcrew.com.au. As at 31 December 2024, e-commerce brands included its magazine websites Magshop Australia and Magshop New Zealand, its gifting website HardToFind, and its business to business distribution website The Market Hub.

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).

Are Media's core business operations are:

- (a) production, publication and sale of print magazines and cook books through newsagents and supermarkets;
- (b) distribution of its own magazines and cook books to newsagents, supermarkets and other retail outlets;
- (c) sale and distribution of other products (primarily gifting and stationery products) to newsagents and other small retail outlets;
- (d) production and communication of digital editorial and commercial content across its owned and operated websites;
- (e) management of e-commerce marketplaces on its owned and operated websites;
- (f) conduct of events associated with its brands;
- (g) sale of advertising, sponsorship, affiliate marketing and brand sampling opportunities in connection with its print and digital publications and events;
- (h) sale of content through licensing and syndication;
- (i) digital and print magazine subscription management for its own publications;
- (j) digital and print magazine subscription management & distribution services to third party publishers; 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) Products including homewares and fashion items predominantly from Australia and the United Kingdom , for sale via our e-commerce marketplaces;
- (e) 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.
- (f) Services of freelance writers, photographers, videographers, artists, models, stylists and hair and make-up artists who are principally located in Australia or New Zealand, with a small number of SEO experts located in India and the Philippines.
- (g) Pre-press services from a supplier in India.
- (h) Marketing and retail store merchandising services from suppliers located in Australia and New Zealand.

- (i) Promotional merchandise principally sourced from China, from suppliers principally located in Australia and New Zealand.
- (j) 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.
- (k) Call centre services from suppliers located in the Philippines and Fiji.
- (l) Research services from suppliers located in Australia and New Zealand.
- (m) Standard office equipment, including stationery, IT equipment and office paper from suppliers located in Australia and New Zealand.
- (n) Travel services from travel providers, who are typically commercial airlines, and accommodation providers.
- (o) 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;
- (p) Broadband, web hosting, adtech and SaaS products from suppliers located in Australia, New Zealand, Europe and the USA.
- (q) Telephony, electricity, gas and water supply services from suppliers located in Australia and New Zealand.
- (r) Office commercial cleaning services and waste disposal services from suppliers located in Australia and New Zealand.
- (s) Labour hire services for certain warehouse functions from a supplier in Sydney.
- (t) Professional services, including consulting, financial and legal advisors from suppliers located in Australia and New Zealand.

4 Risks of modern slavery practices in Are Media's own operations

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

The vast majority of Are Media's 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 such as working holiday visa holders, seasonal workers or international students, where modern slavery can be a risk.

Certain members of Are Media's 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. Most warehouse staff are permanent employees with some labour hire workers sourced from a local labour hire agency under a long-running commercial and trusted relationship. Are Media has a high degree of confidence both with the 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, Are Media has appropriate workplace management policies and practices, including grievance procedures, a whistleblower policy, a discrimination & harassment policy, and an employee Code of Conduct. In 2024 Are Media implemented a new Modern Slavery Policy which was communicated to all staff, and which further strengthens the workplace culture across the organisation. Along with our experienced and capable managers, supported by our People, Culture & Workplace 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.

Are Media does 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 Are Media's 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 2024 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 via a local vendor who manages the process on our behalf with whom we have 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 2024 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. In 2024, all paper purchased was from certified mills.

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 Suppliers of clothing and homewares for Are Media's e-commerce sites

In 2024 our e-commerce sites included the Australian Women's Weekly and Home Beautiful marketplaces in Australia, and the Your Home & Garden marketplace in New Zealand, in addition to the Hard To Find marketplace. Suppliers to these e-commerce sites were primarily Australian and New Zealand local suppliers (~85%), with the balance of suppliers (~10%) coming from the United Kingdom, and a small proportion from other parts of the world including China. Our e-commerce sites were carefully curated by our editors, all suppliers were required to be personally on-boarded through our e-commerce manager, and we have no reason to believe that any of these suppliers were engaged in modern slavery practices. These four e-commerce sites were paused at the end of 2024 due to economic factors.

5.5 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, including:

- (a) A whistleblower policy to help deter wrongdoing relating to our operations. This encourages disclosure of wrongdoing and ensures 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.
- (b) Within our business, we have People Culture & Workplace, Operations, Finance, Payroll and Legal professionals whose roles include ensuring compliance with laws and with our processes and policies.
- (c) We are a buyer member of Sedex, the 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.
- (d) 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.
- (e) auditing 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, those audits have not identified any compliance issues or areas of concern.
- (f) Ensuring key staff who engage with vendors as part of their role, are appropriately trained in modern slavery awareness and compliance.

Further measures introduced in 2024

- (g) Are Media's **vendor onboarding process** was upgraded to include a modern slavery questionnaire. All vendors excluding individual editorial contributors are required to answer the questionnaire before being set up as a new vendor. Each new vendor's completed questionnaire, together with the vendor application, is sent to the General Counsel for vetting. In circumstances where the questionnaire has not been properly completed, the answers given are inadequate or provide cause for concern, or the vendor is in a high risk industry (such as foodservice, cleaning or construction) the

relevant staff member seeking to engage the vendor is notified and the vendor is asked to provide further details in support of their application.

- (h) Are Media implemented a stand-alone **Modern Slavery Policy**. The Policy aims to inform staff about modern slavery risks within the organisation and its supply chains, and provides clear instructions to staff about their obligations.
- (i) Are Media implemented a **Supplier Code of Conduct**. This document aims to establish clear expectations around modern slavery compliance within Are Media's stable of existing and potential suppliers. The Supplier Code of Conduct is available on Are Media's corporate website and is acknowledged by potential suppliers in the vendor onboarding process.
- (j) The company's **training program** has been expanded to incorporate reference to the Modern Slavery Policy and the Supplier Code of Conduct. There is an e-learning module in development, to enable governance around allocation and completion of training.

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 2024, as well as the planned measures for 2025, 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 additional measures implemented in 2024, in particular the vendor onboarding process, have seen a significant uplift in awareness both at a supplier level and within the staff cohort who engage with suppliers.

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 29 May 2025.

A handwritten signature in black ink, appearing to read 'Jane Huxley', written in a cursive style.

Jane Huxley

Chief Executive Officer

29 May 2025