

The Media Store (Australia) Pty Ltd ACN 096 878 143

Trading as

themediastore.

Modern Slavery Statement FY20

March 2021

www.themediastore.com.au

A message from the Chief Executive Officer of themediastore.

The Media Store believes that everyone, everywhere has the right to a life free from slavery, where they have the freedom to make safe, dignified choices about their lives.

We are committed to a supply chain and operations that exclude the use of modern slavery. As a demonstration of this commitment is our first published Modern Slavery Statement.

Whilst no specific instances of Modern Slavery harm have been identified and our supply chain risk remains low, we have identified some areas of improvement.

In these initial reporting years, the emphasis will be on transparency, framework development and a commitment to a program of continuous improvement in identifying and dealing with Modern Slavery to bring about meaningful human rights change.

This Modern Slavery Statement was approved by the Board of the Media Store on 29 March 2021.



Stephen Leeds Chief Executive Officer

tephonful

Warren Hill Director McHic U

29 March 2021



1 Overview of themediastores modern slavery tracking

The Media Store (Australia) Pty Ltd, ACN 096 878 143 (TMS) is committed to the continuous work necessary to ensure that there are no modern slavery practices within its operations and supply chains.

We recognise the importance of ongoing due diligence in identifying and appropriately addressing the risks of modern slavery practices within our operations and supply chains.

After reviewing the nature of our business, we consider that our direct impact in relation to modern slavery practices is low. As we are a small sized entity with approximately 50 employees, the resources available to implement and monitor our management systems and controls is limited. Notwithstanding, we are committed to developing a robust, three-tiered framework which focuses on our human rights commitment, due diligence and remediation as illustrated in the in the image below.

Our developing modern slavery response is informed by the United Nations Guiding Principles on Business and Human Rights. While we are in the early stages of acting to address the modern slavery risks we have identified, we endeavour to implement management processes and controls to integrate our findings, track our progress and to provide effective remediation to individuals and communities impacted by modern slavery.



2 Our structure, operations and supply chain

Who are we?

The reporting entity of this Modern Slavery Statement is The Media Store (Australia) Pty Ltd, ACN 096 878 143 (TMS).

TMS is an independent, locally owned media agency operating in Sydney and Melbourne. TMS is a standalone company which operates as trustee of the Hill Family Trust No.2 trading as the The Media Store. For the period 1 July 2019 to 30 June 2020 (Reporting Period) TMS had a sister company The Media Store Pty Limited, ACN 076 228 683 with which it shares common directors and shareholders.

TMS's sister company provides core administrative and support services to TMS. On June 30th, 2020 TMS had a total workforce of approximately 55 employees.

Our operations

All TMS's operations are conducted in Australia. The key activities of TMS's operations include:



Our supply chain

The main categories of goods and services procured in the Reporting Period are:





Non-trade suppliers







Office operations Human resources

Location of themediastore. suppliers

United States of America

Digital platforms

In 2020, 99% of TMS suppliers were based in Australia





China

Corporate services such as legal, accounting and finance

- Leasing of office
- Office operations such as cleaning and maintenance
- Human resources

3 Our modern slavery risks

TMS acknowledges the complexity of modern slavery risk and the ways it can manifest in operations and supply chains. In 2020 TMS undertook an assessment of the modern slavery risks within our operations and first-tier suppliers. We acknowledge that modern slavery risks exist within the advertising industry however, given the size of TMS and our large supplier base, we do not have the resources to examine modern slavery risks beyond our first-tier suppliers. Notwithstanding this limitation, we are looking to do our best as we further improve our modern slavery processes and engagement with our suppliers.

We are focused on increasing supplier engagement to assist us and our suppliers in identifying modern slavery risks. In instances where our suppliers have published their own Modern Slavery Statement, we have considered these in undertaking our assessment.

99% of TMS's suppliers are based in Australia and the provision and delivery of TMS services and the employment of our staff occur in Australia. We consider the risk of modern slavery within our operations and the first tier of our supply chain as low.

We recognise TMS may be directly linked to modern slavery practices through the various tiers of our supply chains. These risks are identified below:



4 Our action

Due diligence

TMS is committed to preventing modern slavery practices in its operations and supply chains. We recognise the importance of modern slavery due diligence as an ongoing process and as a vital part of our role to prevent modern slavery practices.

To identify and assess actual and potential human rights impacts within our operations and supply chains, TMS introduced a Supplier Code of Conduct (SCC) in 2020. The SCC is provided to all new suppliers and sets out TMS's expectation that suppliers must not engage in modern slavery practices.

TMS also conducts supplier and business number checks to confirm the legitimacy of our suppliers prior to engagement.

All TMS labour is sourced locally. We have internal policies in place that comply with Australian and international labour laws such as our *Discrimination & Harassment Policy* and our *Workplace, Health & Safety Policy*. We are also in the final stages of developing an *Anti-Bribery & Corruption Policy* which will be provided to suppliers prior to entering into new contractual arrangements.

TMS does not yet have processes in place to integrate and track modern slavery risks within our operations and supply chains. We are

putting into place management systems and controls to address impacts through internal training on modern slavery and incident reporting. Part of those processes include obtaining professional advice.

We are also in the process of implementing controls to monitor our progress of implementation actions on a regular basis.





Remediation

TMS recognises that, while we do not directly cause or contribute to modern slavery, we may be linked to modern slavery practices by a business relationship.

We acknowledge that given the size of our business, TMS has limited leverage to influence some of our larger suppliers to change their behaviour. Notwithstanding, TMS is committed to using our leverage to work with suppliers that have caused adverse impacts to prevent or mitigate harm and its recurrence.



We recognise there are gaps within our current processes and as a result, TMS does not currently provide effective remediation for individuals and communities affected by modern slavery practices and other human rights abuses.

TMS commits to addressing human rights grievances. We are currently in the process of developing a robust modern slavery response framework which will be introduced over the next 12 months and will provide more effective grievance mechanisms and avenues for affected individuals and communities to come forward. Some of these mechanisms are listed in the diagram to the right.



Remediation processes to be implemented under our robust response framework going forward



Our developing strategic approach to remediation is informed by Principle 31 of the United Nations Guiding Principles on Business and Human Rights and aims to provide grievance mechanisms that are 'effective' in so far as they can be characterised as being:



5 Assessing the effectiveness of our actions

TMS's monitoring and reporting program is currently under development. Our objective is to operationalise the fundamental human rights due diligence principles in line with the United Nations Guiding Principles on Business and Human Rights.

We recognise the process of developing a robust, effective and sustainable monitoring program requires time and resources.

Our focus this year has been to understand where we are, implement a framework for awareness of modern slavery risks in the workplace and to identify and address the risks as best as we are able to. These initial steps will assist us in building a strong foundation to monitor the effectiveness of our actions.

6

Process of consultation



Consultation with our sister entity was not necessary in the preparation of our Modern Slavery Statement as the officers and personnel of that company are the same officers and personnel of TMS.



7 Any other relevant information

Continuous improvement: planned next steps

TMS is a relatively small business with only 55 employees and does not have significant resources to channel to Modern Slavery issues or look in detail at downstream supply chains of its first-tier suppliers. This could also impact on TMS' ability to implement organisational change promptly.

TMS is also limited in what pressure it can exert on suppliers as most of its significant suppliers are large entities.

Despite these limitations, TMS is seeking advice and developing its processes in a way which aligns with its resources and abilities. TMS is committed to managing Modern Slavery issues in an appropriate manner given the low level of risk assessed for Modern Slavery in its operations and supply chains.

Since 1 July 2020, TMS has taken numerous steps to improve its awareness of Modern Slavery risks and how to respond to those risks. There has been significant improvement in a short space of time and TMS is committing itself to implementing a Modern Slavery framework and a process of continuous improvement to address Modern Slavery issues in its operations and supply chains.

Over the next year, TMS will progress the implementation of its due diligence processes and its grievance mechanisms. TMS aims to commence developing processes to assess the effectiveness of its actions.

The table below provides an overview of TMS's priorities for FY21.





For queries relating to this statement:

Jacquie Alley Chief Operating Officer <u>alleyj@themediastore.com.au</u>

themediastore.com.au



The information in this document is of a general nature and not intended to address the objectives, financial situation or needs of nay particular individual or entity, it is provided for information purposes only and does not constitute, nor should it be regarded in any manner whatsoever, as advice, and is not intended to influence a person in making a decision. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

To the extent permissible by law, The Media Store and its associated entities shall not be liable for any errors, omissions, defects or misrepresentations in the information or for any loss or damage suffered by persons who use or rely on such information including for reasons of negligence, negligent misstatement or otherwise.

The Media Store name and logo are trademarks of The Media Store.

March 2021.