



2022 Modern Slavery Statement

Melbourne, Australia; 23 December 2022: Redbubble Limited (ASX: RBL; ADR: RDBBY) has released its 2022 Modern Slavery Statement. A copy is attached.

This announcement was authorised for release to the ASX by Carlie Hodges, Company Secretary.

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About Redbubble Group

Founded in 2006, the Redbubble Group incorporates Redbubble Limited and its subsidiaries, including TP Apparel LLC (TeePublic). The Redbubble Group owns and operates the leading global online marketplaces, Redbubble.com and TeePublic.com. The Redbubble Group's community of passionate creatives sell uncommon designs on high-quality, everyday products such as apparel, stationery, housewares, bags, wall art and so on. Through the Redbubble and TeePublic marketplaces, independent artists are able to profit from their creativity and reach a new universe of adoring fans. For the artists' customers, it's the ultimate in self-expression. A simple but meaningful way to show the world who they are and what they care about.



Where
creativity
meets
commerce

Modern Slavery
Statement
FY2022

Modern Slavery Statement FY2022

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1. Message from the Board Chair and CEO

Redbubble respects the human rights of all people. This includes the right to not be held in any form of slavery or servitude - a stark reality for tens of millions of people across the world. Modern slavery is an abhorrent violation of human rights which is unconstrained by geographic borders and from which no industry is immune. No single entity can eliminate modern slavery, however, no single entity can stand idly by, whether directly or indirectly exposed to human rights abuses. Addressing modern slavery demands the collective and collaborative efforts of governments, international organizations, civil society, and the private sector.

For Redbubble, this means our modern slavery efforts reach beyond our immediate workforce of 349 employees based in Australia, United States, and Germany, and extend to the independent businesses that participate in Redbubble's marketplace.

In our [FY2021 Modern Slavery Statement](#), we signaled our intent to engage third-party fulfillers on the Redbubble marketplace to assess and address risks of modern slavery within their businesses. Over the past 12 months, we made progress on our commitments, including hiring dedicated staff to increase awareness of modern slavery among marketplace fulfillers to help them understand the issue and our expectation that they address it within their businesses. In addition to policy and training, we made available to fulfillers best practice risk identification tools and commissioned independent third-party audits of their manufacturing operations under Fair Labor Association standards. As we did in FY2021, we have set out new goals in FY2022 to raise the bar for ourselves and those who contribute to Redbubble marketplaces.

More broadly, beyond our efforts to address modern slavery with marketplace fulfillers, we were pleased to support the International Rescue Committee in FY2022. The International Rescue Committee is a humanitarian aid organisation providing support to millions of people displaced due to the Ukraine conflict and at risk of human trafficking and abuse. To do this, we activated Redbubble's Global Events policy, which enabled us to direct 100% of service profits from purchases supporting Ukrainian artists and artwork to non-profit organisations.

There are no single solutions to addressing modern slavery, therefore Redbubble will continue using a variety of approaches through collaboration and best practices to learn and push for change. We will also continue to keep public transparency a priority - consistent with our broader ESG strategy - in order to share our learnings and continue holding ourselves accountable with stakeholders.

We trust this annual update delivers insights into how we have and will continue to address modern slavery. As we have shared in past public reporting, Redbubble's marketplace business model, since its inception, has always emphasised a strong focus on social good. With this in mind, we will continue to take action and report publicly on our efforts to ensure our people and those contributing to our marketplace are treated with fundamental dignity and respect.



Anne Ward
Board Chair



Michael Ilczynski
Chief Executive Officer

2. About Redbubble

Redbubble Group was founded in 2006 and comprises two global online marketplaces: Redbubble.com and TeePublic.com. In FY22, the Redbubble and TeePublic marketplaces connected over 809,000 selling artists who use our marketplaces to design and sell products printed with their art, 8.3 million of their customers, and 33 third-party fulfillers globally, helping to bring more creativity to the world.

Redbubble Group's marketplaces enable artists to quickly upload artwork to their marketplace of choice. Consumers are then able to find that unique piece of art and purchase it on a physical product. Once purchased, the product is printed on demand by one of 33 fulfillers and shipped by a carrier directly to the artist's customer.

Over 100 different physical product types are available across Redbubble Group marketplaces. Below is a non-exhaustive list of the types of products artists can choose to sell through our marketplaces to their customers.

- Clothing (t-shirts, hats, skirts)
- Stickers
- Phone cases
- Wall art
- Pet products (bowls, mats)
- Accessories (backpacks, water bottles)
- Stationary (greeting cards, notebooks)

Redbubble Group operates around the world. Our headquarters are located in Australia (Melbourne) and we have offices in the United States (New York City and San Francisco) and Germany (Berlin). Artists and fulfillers who participate in our marketplaces are third parties who operate their own independent businesses.

As at the end of FY2022, Redbubble's workforce consisted of 349 employees. Below is a breakdown of the composition of our workforce:

- 43% in Australia, 48% in the United States, and 9% in Europe
- 94% full time; 6% part time
- 140 new hires in FY2022

Redbubble's workforce includes professional services and administrative roles, such as software engineering, marketing, finance, and product/program management.

The operating entities within the Redbubble Group are as follows:

- The parent company of the group is Redbubble Limited (ACN 119 200 592). Redbubble Limited is listed on the Australian Securities Exchange (ASX:RBL).
- Redbubble Inc. is a wholly-owned subsidiary of Redbubble Limited, registered in Delaware USA, and operates business from an office in San Francisco. Redbubble Inc. is the operating company for the Redbubble marketplace.
- Redbubble Europe GmbH is a wholly-owned subsidiary of Redbubble Limited, registered in Berlin, Germany. Redbubble Europe GmbH carries out administrative functions in relation to the German, French and Spanish language versions of the Redbubble website.
- TP Apparel LLC is a wholly-owned subsidiary of Redbubble Inc., registered in New York USA and operates business from an office in New York. TP Apparel LLC is the operating company for the TeePublic marketplace.

Redbubble Limited (ACN 119 200 592) is the reporting entity under the Modern Slavery Act and this statement is made by Redbubble Limited for itself and on behalf of the subsidiaries referred to above. These subsidiaries are consulted in the development of our response to modern slavery risk and the content of this statement.

Unless otherwise noted, the information provided in each section of the statement applies to all reporting entities listed above. Where appropriate, we have provided specific information about reporting entities' individual circumstances and contexts.

Our approach to modern slavery is group wide. Internal stakeholders across each of the entities above were consulted during the drafting of this statement and were given the opportunity to review and provide feedback at several stages of the process.

Governance

Governance over modern slavery and how Redbubble assesses and addresses those risks sits with the following personnel:

- Redbubble's Board of Directors has ultimate oversight of, and accountability for modern slavery risks within the Group, which includes approving this statement, risk assessments, reporting, and action plans. The Audit and Risk Committee oversees the Group's risk framework on behalf of the Board.
- In FY2022, Redbubble appointed a Vice President of Environmental, Social, and Governance who is responsible for organizing the Group's company-wide strategy given modern slavery risks are not isolated to one functional area.
- Executive Team members reporting to the CEO are accountable for the Group's initiatives to identify and address modern slavery. For example, Redbubble's Chief Supply Chain Officer oversees the Supply Chain Social Responsibility program, which works with independent auditors to conduct supply chain assessments in order to identify indicators of modern slavery.
- Senior Leaders reporting into the Executive Team are responsible for executing initiatives to identify and address modern slavery within their functional area. For example, the Director - Quality & Social Responsibility and Social Responsibility Operations Manager are responsible for executing programs to further alignment with Redbubble's Social Responsibility expectations, which prohibit forced labour.

2. About Redbubble Continued

Vision, Mission, Values, and Behaviours

Redbubble's vision is to *be the most loved place at the intersection of expression, empowerment, and commerce – bringing every person the very thing that gives them joy. Our mission is to create the world's largest, ever evolving marketplace that unlocks infinite opportunities for independent artists, their customers, third-party fulfillers, and our employees.*

Two core values have been consistent at Redbubble over time: Creativity and Compassion. Creativity reflects our business model and we thrive on the creativity that artists bring to our platform. It also signals the way we approach our

work; looking for creative solutions that meet our needs rather than traditional ones that may not. Compassion is core to our diversity and inclusion principles, our care for artists' success, our approach to content moderation, and our support for key cultural moments when we know our business can serve as a force for good.

In addition to our values, we introduced core behaviours in 2021 as part of a move towards a greater performance focus that weighs "what" was delivered equally with "how" it was delivered. These behaviours underpin our work and shape our interactions with each other, artists, their customers, and the wider Redbubble community.

They are:

- **Be bold, aim high:** Set ambitious OKRs and support each other to achieve them
- **Right thinking, right people, right time:** Balance collaboration, effort, risk and speed, with potential value
- **Proactively solve for the greater good together:** Develop scalable and sustainable solutions for Redbubble, not ourselves
- **Rapidly deliver value:** Have a sense of urgency, develop incremental improvements that add value
- **Have trust, build trust:** Always assume good intent

3. What is Modern Slavery?

The International Labour Organization estimates 50 million people were living in modern slavery in 2021; of which 28 million were in forced labour – a significant increase over the past five years. Modern slavery occurs when a person is coerced into work and exploited for personal or commercial gain.

Under Australian law, modern slavery includes the following forms of exploitation:

- I. Trafficking in persons
- II. Slavery
- III. Servitude
- IV. Forced labour
- V. Forced marriage
- VI. Debt labour
- VII. Deceptive recruiting for labour or services
- VIII. Child labor

According to the Australian Border Force, "modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers, although these practices are also harmful and may be present in some situations of modern slavery."

The [International Labor Organisation](#) and [Australian Government](#) have in depth information and further resources on modern slavery.

4. Redbubble's Modern Slavery Risk

Redbubble recognises that modern slavery risks can arise internally within Redbubble's own operations/workforce and in the marketplace supply chain consisting of third parties. To assess risk, we recognize - as has been documented through research and data available, for example through the Global Slavery Index - that different sectors and geographic regions carry different modern slavery risk profiles. We also recognize the responsibility we have – as set forth by the UN Guiding Principles – to establish programs to assess and address where Redbubble's activities may cause, contribute, or be directly linked to modern slavery.

Redbubble's own Operations

With respect to the Group's internal operations, we have in place a robust suite of policies and procedures, as well as grievance and whistleblowing channels to assist in identification and mitigation of potential risks of modern slavery. Based on the location of the workforce (Australia, US, Germany), office setting (leased/co-located vs owned), job composition (professional services), management processes (working rights checks) and onboarding procedures (code of conduct), we have no indication of modern slavery in our own operations. We plan to continue to promote strong policies, promote engagement mechanisms, and expand the scope of due diligence within our own workforce (see Future Developments below).

Operations not owned by Redbubble

Tier 1 - Marketplace Supply Chain

As described in our FY2021 modern slavery statement, Redbubble conducted a due diligence exercise in 2020 to understand modern slavery risks in the Marketplace Supply Chain. This began with questionnaires and desktop research, which focused on print on demand fulfillers (i.e., tier 1), independent businesses who participate in the Redbubble marketplace. These fulfillers have operations in the following countries:

- Australia
- Canada
- Czech Republic
- France
- Germany
- Italy
- Mexico
- Netherlands
- Spain
- USA
- United Kingdom

These fulfillers own and operate printing businesses that transfer artwork uploaded by artists to the Redbubble marketplace onto blank products in order to make the final products that are delivered by third-party carriers to the artists' customers. Engaging the first tier of third-party fulfillers was an important foundational step for us. Doing so allowed us to foster collaboration between Redbubble and fulfillers, promote supply chain transparency, seek information on any known instances or indicators of modern slavery, and work together on areas for future due diligence, including the mapping and assessment of risk presented by their suppliers described further below.

The composition of roles at these fulfillers include, for example, printing specialists, shipping clerks, and sales associates. Modern slavery risks at these sites might include forced/mandatory overtime, deceptive recruiting practices, and/or manipulative management practices including threats/harrassment/coercion. To mitigate risks of modern slavery within these fulfiller owned operations, Redbubble has taken steps to raise awareness and we have engaged independent third-party auditors to perform on-site audits (see Redbubble's Response below).

Beyond Tier 1 of the Marketplace Supply Chain

Modern slavery risks also exist within the operations of companies that make and sell blank products to tier 1 fulfillers, such as the companies that manufacture blank clothing or notebooks (tier 2) and, in turn, companies that process and sell the raw materials in those products, such as fabric or paper (tier 3). We acknowledge that we currently lack visibility down to the deepest tiers of the supply chain (e.g., mills) and that this lack of visibility presents unknown risks of modern slavery. To address this issue, in FY2022, we began an initiative to gain additional visibility into the more distant tiers of the marketplace supply chain, which we describe in more detail below (see Future developments).

5. Redbubble's Response to Modern Slavery Risk

Investments

In FY2022, Redbubble made significant financial investments in people and programs designed to address modern slavery and, more broadly, social impact. For example, given the aforementioned risks presented by the marketplace supply chain, we funded and hired a new, full-time role, Social Responsibility Operations Manager, within Redbubble's Supply Chain organisation. This role oversees social responsibility initiatives, which include increasing awareness among marketplace fulfillers on modern slavery and coordinating with third party audit firms on social compliance audits to assess risks of modern slavery. Also, in FY2022 Redbubble funded and appointed a new, full-time role, Vice President of Environmental, Social, and Governance (ESG). This role is responsible for developing Redbubble's ESG strategy, which includes defining and partnering with teams across Redbubble on human rights related goals, including modern slavery.

Policy and Training

Modern Slavery Guidance and Risk Screening Toolkit.

In order to obtain approval to participate in the Marketplace, third party fulfillers are asked to acknowledge and confirm that they will at all times meet or exceed Marketplace expectations. This includes the Fair Labor Association Workplace Code of Conduct and Compliance Benchmarks and that they will reasonably cooperate with third-party social responsibility auditors in connection with the approval process.

Fulfiller Engagement

Redbubble's efforts to address modern slavery does not stop at policies and acknowledgements alone. In FY2022, Redbubble made available to marketplace fulfillers materials concerning the risks of modern slavery. These education

provided, for example, a background on modern slavery and its risks and recommendations by industry bodies for assessing and addressing modern slavery. We're providing transparency into the scope of these efforts below:

- **Content:** Information was made available on the regulatory landscape of modern slavery, current trends, potential risks in the direct and indirect supply chain, red flags and triggers to indicate further investigation is warranted that a modern slavery issue may be occurring.
- **Coverage:** 55 different sites were provided materials on this topic, involving approximately 110 fulfiller employees.
- **Results:** This gave marketplace participants an opportunity to present the challenges surrounding labour and sourcing in their businesses and supply chains and to compare their direct experiences with industry wide trends. Recruitment of temporary workers was a common challenge given that fulfillers have had to employ a variety of new recruiting practices to attract workers. We believe that our efforts helped them to understand and be aware of potentially deceptive recruiting practices that might arise in their businesses.

Independent Audits

Fulfillers are expected to align with the standards laid out in the Fair Labor Association (FLA) Code of Conduct. The FLA standards are informed by the International Labor Organization standards and recognised as a global benchmark. FLA's code defines standards for upholding workers' rights, including the following direct and indirect indicators of modern slavery:

- **Harassment or Abuse:** No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

- **Forced Labour:** There shall be no use of forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.
- **Child Labor:** No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher
- **Freedom of Association:** Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.
- **Hours of Work:** Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed.
- **Compensation:** Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income.

Intertek, an independent auditor, conducts social responsibility audits based on the FLA standards above as part of the approval process to participate in our marketplace. As of October 2022, Intertek audited 97% of fulfillers and zero instances of child labor or forced labor were identified. Our goal is for Intertek to audit 100% of fulfillers by the end of 2022.

Redbubble is committed to respecting human rights across those businesses participating in our marketplaces. We are also committed to cooperating in remediation where our operations may have caused or contributed to modern slavery-related impacts. Where a legitimate concern or issue may be raised or identified by a Redbubble employee, a fulfiller or a third party, Redbubble will seek to work with the relevant parties on an appropriate remedy. In all instances, Redbubble will seek to place the affected individual's needs first.

6. How Redbubble Assesses the Effectiveness of our Actions

Our management of modern slavery risks is assessed and managed according to Redbubble's enterprise-wide risk framework, which defines the escalation threshold for reporting risks to Redbubble's Audit and Risk Committee. The Audit and Risk Committee is responsible for providing oversight of that risk framework on behalf of the Board.

As an example, Social Responsibility - specifically within independent businesses participating in Redbubble marketplaces, but not owned or controlled by Redbubble - was identified as a material risk to Redbubble. The Audit and Risk Committee is responsible for evaluating and overseeing the effectiveness of our Social Responsibility risk management systems and processes, which include assessing and addressing risks of forced labour. Redbubble's Environmental, Social, and Governance strategy also encompasses modern slavery and a public commitment to ensure that marketplace fulfillers are aligned to Redbubble's Social Responsibility expectations.

As of 1 November 2022, the independent auditor has conducted 48 audits across a total of 53 fulfiller locations based in the United States of America, Canada, Mexico, the United Kingdom, Spain, Italy, the Netherlands, France, Germany, Czech Republic, and Australia. The audits were conducted by Intertek, an independent third party audit firm, according to Fair Labor Association standards. Auditors identified no forced labour findings through these audits. The audits also identified no findings that could be potential indicators of forced labour, such as recruitment fees, document retention, and mandatory overtime.

The Redbubble Board has ultimate oversight of modern slavery related risks and activities, including but not limited to the annual review and approval of Redbubble's modern slavery statement.

7. Future Developments

Human Rights Strategy and Policy

Modern slavery risks are more likely to exist in settings where human rights, more broadly, are not understood and respected. Consequently, we have included in our 2023 plans a goal to develop a strategy around human rights. Our strategy will have the goal of providing a broader framework for how we address the human rights of our people, participants in the marketplace, and communities Redbubble marketplaces impact. We look forward to providing more information on our progress in future reporting.

Visibility beyond tier 1 marketplace supply chain fulfillers

In 2022, we launched an initiative with the goal of providing more visibility into the source of blank products purchased by tier 1 fulfillers. The intent is to:

1. Help first tier fulfillers appreciate and acknowledge their own responsibility which as a first step means bringing transparency into where they source their products;
2. Develop a deeper understanding of the makeup of deeper tiers of the marketplace supply chain;

3. Assess and prioritize modern slavery initiatives based on the risk profile of their suppliers; and,
4. Facilitate fulfillers' mitigation of risks that may exist.

We are at the first step of this effort and will report further information on our efforts in future reporting.

Inquiries regarding Redbubble's Modern Slavery Statement or related concerns can be sent to esg@redbubble.com.

