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oOh!media

Modern Slavery Statement
for the reporting period 1 Jan - 31 Dec 2023

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The billboard features a pink header with the text: "What are your biggest barriers?" and "We're answering Australia's top questions about blindness and low vision." Below this is a photograph of a smiling woman. To the right of the photo is a QR code and the text "Learn more to change more". At the bottom right is the Guide Dogs logo with the tagline "For a boundless world." The "oOh!" logo is in the top right corner of the billboard frame.

Introduction

oOh!media Limited (ABN 69 602 195 380) (**OML**) presents this joint Modern Slavery Statement on behalf of itself and each of its Australian subsidiaries as listed in Attachment 1. OML and its Australian subsidiaries are referred to in this Statement as 'the oOh! Group', 'the Group' or 'oOh!'.

This Statement is prepared for the reporting period ended 31 December 2023 (**CY23**) and builds on the oOh! Group's third Modern Slavery Statement for the year ending 31 December 2022.

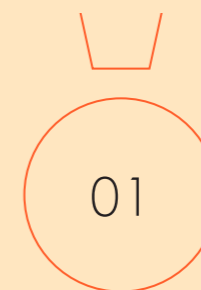
oOh! is committed to combatting modern slavery, and actively promotes ethical practices, transparency and accountability throughout its operations and supply chain. The actions outlined in this Statement build upon foundational work previously undertaken by oOh!, with a heightened emphasis on the most effective actions as informed by insights gained through implementing its Anti-Modern Slavery (**AMS**) plans in preceding years.

¹ The oOh! corporate group includes, in addition to the Australian subsidiaries, four wholly owned subsidiaries which carry on business solely in New Zealand, as identified in Attachment 1.





Structure & Operations





Structure & Operations

The oOh! Group, together with its New Zealand subsidiaries, has an **extensive network of more than 35,000 digital and static asset locations** which includes roadsides, retail centres, airports, train stations, bus stops, office towers, and universities across Australia and New Zealand.

OML is a public company listed on the Australian Securities Exchange (**ASX**) and the parent company in the oOh! Group. Its registered office and principal place of business is Level 2, 73 Miller Street, North Sydney NSW 2060.

The oOh! Group, a market leader in the Australian Out of Home media industry, enhances public spaces through the creation of engaging environments that help advertisers, landlords, leaseholders, community organisations, local councils and governments reach large and diverse public audiences.



With offices and warehouses across Australia and New Zealand to service and support its network, the oOh! Group and its New Zealand subsidiaries had **consolidated revenues of \$633.9 million in 2023 and \$592.6 million in 2022.**

The oOh! Group had approximately

800

employees and fixed term contractors as of 31 December 2023, working across Australia and New Zealand.

During CY23 the Group's business operations included the provision of services to customers in:

- media/advertising;
- content creation, procurement and supply;
- street furniture installation and maintenance; and
- large-scale printing.

Operations also include the Group's corporate functions.



oOh! Group Supply Chains





oOh! Group Supply Chains

Other than some 'whole of enterprise' engagements, which are managed by the Group Procurement function, oOh!'s procurement relationships are specific to each area of operations.

Key categories of operations and spend are:

-  Media services
-  Content services
-  Street furniture services
-  Printing
-  Corporate functions (internal).

The overwhelming majority of the Group's direct supplier relationships are with suppliers based in locations that have higher awareness and relatively lower risks of modern slavery, namely Australia and New Zealand.

Some higher risk locations, namely China, Malaysia and India, are amongst oOh! sources for digital display units and spare parts, bus shelters and component parts, substrates for printing and inks, paper, labels and packaging, marketing merchandise or information technology.



Work to date in respect of oOh!'s supply chains has accordingly focused on the risks inherent in suppliers (either tier 1 i.e. direct suppliers, or known second or subsequent tier) known to be located in higher risk geographic locations and those providing higher risk products or services, particularly where these risks intersect.



Modern Slavery Risks



Modern Slavery Risks

As previously reported, the inventory of the Out of Home media industry is unique in nature, being licences and leases over Australian and New Zealand real estate on which signage is installed. As such, it represents a low inherent risk of modern slavery.

Other oOh! supply chains with lower risks of modern slavery exist where major suppliers to the Group are based in Australia or New Zealand and operate in highly regulated industries, such as banking & insurance, professional services and data services.

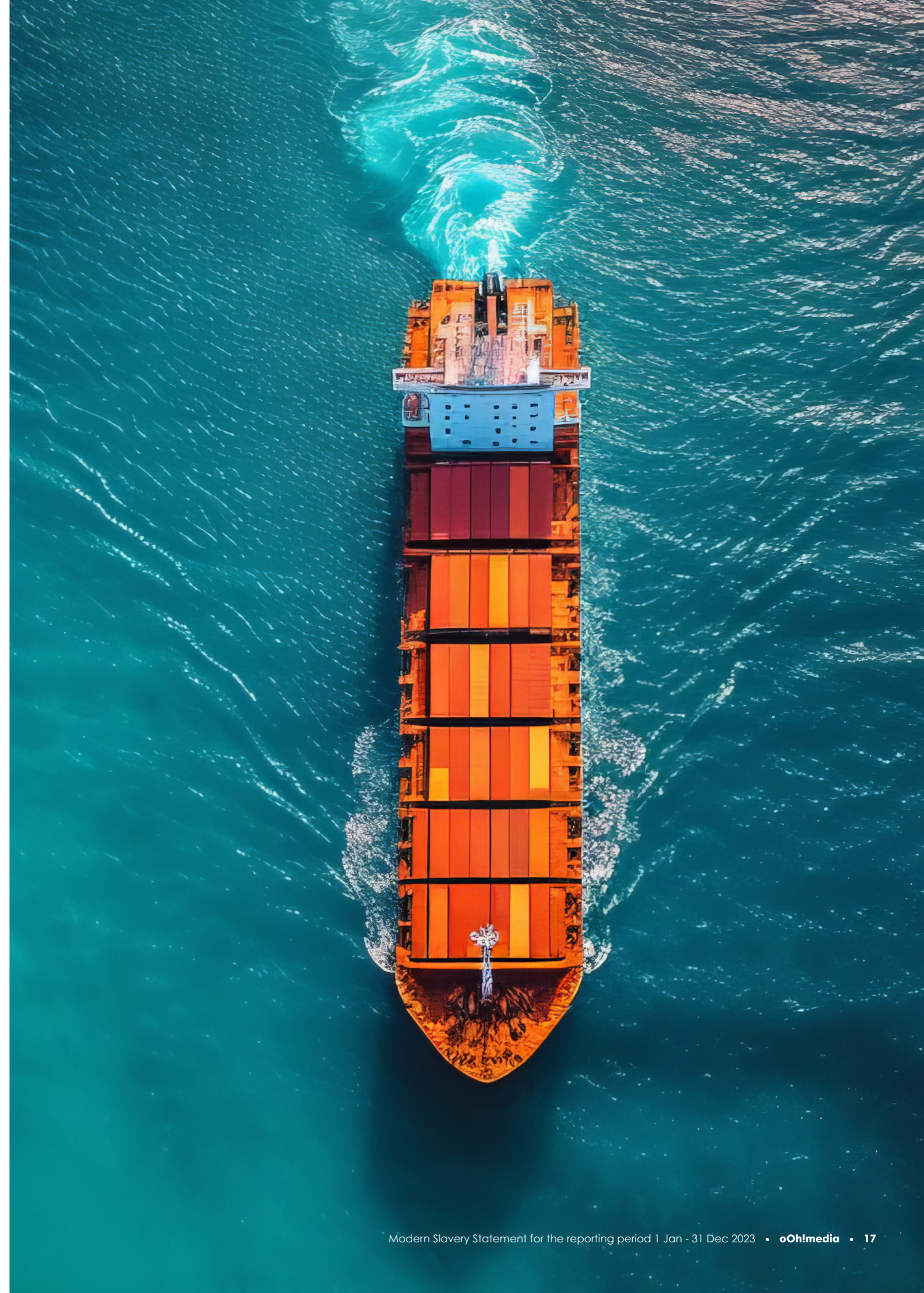
Developing from prior years' work, oOh! has continued to expand the list of goods and services in its supply chains that it considers to be of potentially highest risk of modern slavery, particularly where sourced from higher risk countries. These expanded categories will be included in future due diligence investigations:

Higher risk products

	Digital display units and component parts.
	Bus shelters and component parts.
	Substrates/canvasses/printing inks.
	Marketing merchandise.
	Laptops and related information technology equipment.
	Office equipment including copiers, printers, commercial printers.

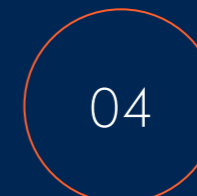
Higher risk services

	Information technology.
	Shipping.
	External processing centres used by oOh!'s direct suppliers of professional services (such as accounting, legal and banking services).
	Cleaning of office and warehouse premises.
	Waste management.
	Construction, maintenance and posting of advertising assets.





Assessing and addressing modern slavery risks



Assessing and addressing modern slavery risks

Status at start of reporting period

oOh! had, by the start of CY23, undertaken the below actions, as described in its Modern Slavery Statements for CY20, CY21 and CY22.

Previous actions to investigate and assess modern slavery risks

CY20	Specialised procurement function established.
CY20	New vendor onboarding process introduced.
CY20	Review of supply chains & Desktop Review of supplier data undertaken.
CY20	Vendor due diligence questionnaire initiated.
CY21	Expansion and embedding of vendor onboarding process.
CY21	Focussed Vendor due diligence.
CY21	Standardised approach to modern slavery risk-assessment 1.
CY21	Centralised record keeping.
CY22	Expanded our view of higher risk products and services under closer review.
CY22	Whole-of-enterprise general ledger/accounting system.
CY22	Expansion of Vendor Onboarding processes and modern slavery risk data capture.
CY22	Feasibility assessments of third party support.

Previous actions to address modern slavery risks

CY20	Code of Conduct confirms commitment to address modern slavery.
CY20	Modern Slavery awareness raising training of Executives.
CY20	New anti-modern slavery contract provisions introduced.
CY20	Anti-modern slavery Practice Note developed.
CY21	Revised supplier contract terms.
CY21	Anti-modern slavery Practice Note rollout.
CY22	Checking use of modern slavery risk-based contract terms.
CY22	Annual reminder letter to medium-high modern slavery risk suppliers initiated.
CY22	Development of draft modern slavery remediation principles for adoption.

Overview of actions taken in CY23

In CY23, oOh! expanded its commitment to ethical and socially responsible business practices with various initiatives and enhancements to its policies, procedures, and practices.

oOh!'s AMS Working Group, which comprised the Group CFO, and other specialists including members of the Legal, Procurement, Finance and newly established ESG teams, played a pivotal role in advancing its AMS initiatives and embedding them throughout the business operations and company culture.

Building on the foundational work noted in the above section, oOh! undertook the additional actions set out below in CY23.

CY23 actions to investigate and assess modern slavery risks

- Continued to expand our view of higher risk products and services requiring closer AMS review and monitoring.
- Reviewed and enhanced vendor onboarding processes and modern slavery risk data capture.
- Onboarded third party ESG risk management and compliance solution.
- Implemented CY22 AMS initiatives into BAU.

CY23 actions to address modern slavery risks

- Implemented standardised clauses in contracts with higher risk vendors to ensure AMS risk is managed appropriately, and continued to review use of AMS clauses in existing contracts.
- Issued periodic reminder letter to medium-high modern slavery risk suppliers initiated.
- Continued targeted training of staff with highest exposure to modern slavery risks.
- Onboarded an online training provider to deliver mandatory company-wide AMS awareness training.

Expanded view of higher risk products and services

The AMS Working Group continued to expand the scope of goods and services it considers to be of potentially higher risk, and extended its focus beyond tier 1 suppliers. For example, in CY23 oOh! investigated higher-risk goods and services provided to tier 1 suppliers, even though the services provided by those tier 1 suppliers themselves posed lower modern slavery risks. Examples of this included local professional services, where the tier 1 professional firms used offshore processing centres, and local manufacturers of electronic goods, where component parts are sourced from overseas.

Review of Vendor Onboarding processes

The vendor onboarding processes developed during CY20-21 are now applied consistently across all Australian and New Zealand operations, with the Vendor Onboarding Form having been embedded into the new whole-of-enterprise general ledger system. This integration enhances both the efficiency of modern slavery resource allocation, freeing resources for more impactful AMS actions, and reporting capabilities.

During CY23, the AMS Working Group conducted a comprehensive review of the current vendor onboarding processes and modern slavery risk data capture. This review aimed to identify opportunities for improvement and enhancement, leading to the development of new processes, policies, and procedures slated for implementation in 2024.



ESG management solution

During CY23, oOh! carried out a robust market sounding exercise for the most suitable tool to support our efforts with identifying, managing and mitigating modern slavery risk. Following this exercise, oOh! selected and onboarded Fair Supply, a highly regarded ESG risk management and compliance solution, to enhance our existing capabilities. Leveraging business data and proprietary supply chain mapping technology, Fair Supply can offer comprehensive insights into both our upstream and downstream supply chains.

Moving forward, the integration of Fair Supply into oOh!'s vendor onboarding process will ensure seamless compliance and further embed AMS risk processes into oOh!'s standard operations. This platform will empower oOh! to enhance its due diligence processes, streamline compliance assessment and monitoring capabilities, and drive continuous improvement in combating modern slavery across our direct operations and supply chains.

Implemented CY22 AMS initiatives into BAU

Initiatives introduced in oOh!'s previous AMS work plan have become part of 'standard operations' for relevant staff. These include completing and verifying vendor onboarding processes, issuing due diligence requests for all staff exposed to higher-risk vendors, evaluating responses using modern slavery risk assessment tools, and maintaining a register of suppliers with moderate or higher modern slavery risks.

Additionally, initiatives that commenced as project work to enhance AMS processes and procedures have moved to annual reviews. These initiatives include the development of a new Vendor Onboarding Form, enhancements to the modern slavery due diligence questionnaire as well as to oOh!'s responses to due diligence requests it receives.

Checking use of modern slavery risk-based contract terms

The use of increments to the standard contract terms for increasingly higher modern slavery risk profiles was introduced in CY20. In CY23 the Procurement function continued to oversee the application of modern slavery risk-based contract terms against modern slavery risk profiles of both new vendors and existing vendors whose contract terms are being reviewed.

Periodic reminder letter to medium-high modern slavery risk suppliers

oOh! continued to issue periodic letters to all vendors identified as having a medium-high modern slavery risk. This communication serves to remind vendors of their obligations and urges them to promptly inform us of any changes in circumstances that may impact our initial risk assessment of them.

Training and awareness

During CY23, oOh! continued to deliver targeted training to staff with the highest exposure to potential modern slavery risks, to reinforce knowledge of appropriate purchasing behaviours and standards.

oOh! also selected and onboarded an online training provider to deliver anti-modern slavery awareness training to all staff across the business in CY24. This training aims to raise awareness, educate our workforce, and empower them to identify and address potential risks of modern slavery in our operations and supply chain.



Assessing the effectiveness
of the actions taken





Assessing the effectiveness of the actions taken

Review of effectiveness

oOh!, guided by the AMS Working Group, is committed to continuously improving its approach to addressing modern slavery risks, with ongoing efforts aimed at refining the Group's anti-modern slavery endeavours more strategically and effectively. During CY23 this centred on:

1. increasing the automation of both data captured by oOh! in respect of its upstream suppliers, and oOh!'s responding to requests from its downstream buyers to inform their modern slavery risk assessments; and

2. investigating oOh!'s options to use third party certifications and 'good/bad supplier' lists and recommendations, for executive decision in CY24.



Anti-modern slavery oversight

Modern Slavery is included in the Annual Workplan of the Board's Audit, Risk and Compliance Committee (ARCC) and constitutes an integral component of the oOh! Group governance and risk frameworks. It is also included in oOh!'s ESG governance oversight and reported on in the Group's Sustainability Report, set out in its 2023 Annual Report available at: <https://investors.oohmedia.com.au/>.

Annual reviews of oOh!'s governance and risk frameworks, along with bi-annual reviews of all policies, are an inherent part of oOh!'s governance and risk frameworks, and are also undertaken in respect of anti-modern slavery policies and processes.

ooh!

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Consultation with
Group subsidiaries

06



Consultation with Group Subsidiaries

oOh! approaches regulatory compliance and risk management on a Group-wide basis, including in respect of modern slavery.

As a result, oOh!'s policies and procedures apply across the entire Group, with occasional variation as required by operational matters such as legacy systems.

In addition, the work on the introduction of a new accounting system across the Group included a review and revision of the (formerly named) New Vendor Form – which was the subject of significant user feedback and some refinement as a result, including being renamed the Vendor Onboarding Form.

Ongoing consultation remains a key component of both the supply chain review and the consequent assessment of modern slavery risk within supply chains.



Commitment to
continuous improvement



Commitment to continuous improvement

The oOh! Group recognises that preventing modern slavery requires a continuing year-on-year commitment.

The Group is committed to continuously improving modern slavery risk identification, mitigation in its supply chains and remediation in any instances where modern slavery may be identified.

oOh! will continue to track and publicly report on progress through its annual Modern Slavery Statements.



Attachment 1

OML's Australian subsidiaries

Name of Entity	ABN
Cactus Imaging Holdings Pty Limited	84 129 630 539
Cactus Imaging Pty Limited	37 072 625 720
Closebuys Pty Limited	55 154 140 502
Executive Channel Pty Ltd	78 111 937 234
Executive Channel International Pty Ltd	13 168 374 114
Eye Corp Pty Limited	85 064 564 496
Eye Corp Australia Pty Limited	62 069 009 614
Eye Drive Melbourne Pty Limited	79 006 468 391
Eye Drive Sydney Pty Limited	98 007 305 179
Eye Mall Media Pty Limited	72 076 870 347
Eye Outdoor Pty Limited	37 097 413 351
Eye Shop Pty Limited	30 083 817 912
Faster Louder Pty Ltd	63 108 083 192
Homemaker Media Pty Limited	39 156 361 536
Inlink Café Pty Ltd	44 148 167 604
Inlink Fitness Pty Ltd	85 153 851 542
Inlink Office Pty Ltd	96 100 091 469
InTheMix dot com dot au Pty Ltd	76 114 153 310
oOh!media Assets Pty Limited	63 103 552 414
oOh!media Café Screen Pty Limited	82 155 476 458
oOh!media Digital Pty Limited	66 082 571 462
oOh!media Factor Pty Limited	64 093 932 588
oOh!media Fly Pty Limited	55 094 425 395
oOh!media Group Pty Limited	96 091 780 924
oOh!media Lifestyle Pty Limited	88 105 665 076
oOh!media Locate Pty Ltd	50 113 793 650
oOh!media MEP Pty Limited	91 103 820 266
oOh!media Office Pty Limited	98 089 615 814
oOh!media Operations Pty Limited	44 094 713 210
oOh!media Produce Pty Limited	57 088 916 616
oOh!media Regional Pty Ltd	80 062 090 653
oOh!media Retail Pty Limited	40 116 539 505
oOh!media Roadside Pty Limited	72 099 303 670

Name of Entity	ABN
oOh!media Shop Pty Limited	64 107 873 487
oOh!media Street Furniture Pty Ltd	77 000 081 872
oOh!media Study Pty Limited	29 093 233 768
Outdoor Media Operations Pty Limited	84 154 668 087
Outdoor Plus Pty Limited	003 443 463
Qjump Australia Pty Limited	93 126 597 199
Red Outdoor Pty Ltd	41 129 723 075
Sound Alliance Nominees Pty Ltd	119 522 155
Thought By Them Pty Ltd	22 114 949 405

OML's New Zealand subsidiaries

	Company number
Calibre Audience Measurement Limited	8149503
oOh!media New Zealand Limited	1553088
oOh!media Retail New Zealand Limited	1105338
oOh!media Street Furniture New Zealand Limited	902243
oOh!media Study New Zealand Limited	1273160



Board Approval

This Statement has been approved by the Board of Directors of oOh!media Limited and is signed on its behalf and on behalf of the oOh! Group by



Tony Faure
Chair

June 2024



Cathy O'Connor
Managing Director





oOh!media

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