

## MODERN SLAVERY ACT STATEMENT: JUNE 2022

### 1. Introduction

Clemenger Group Limited (ACN 004 882 928) (**Clemenger**) is committed to respecting human rights and believes there is no place for modern slavery within the operations of any ethical business. We are joining the challenge to combat modern slavery by working to guard against this practice in our own supply chains and operations.

Modern slavery refers to cases of serious exploitation, including where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery impacts men, women and children and includes situations where individuals are forced to work against their will under threat.

This statement affirms Clemenger's dedication to the highest ethical standards and sets out the approaches we are taking to reduce the risk of modern slavery practices within our supply chains and operations, in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

### 2. Our Structure, Operations and Supply Chain

#### Organisational Structure

Clemenger is an Australian non-listed public company limited by shares and is registered in Victoria. Clemenger is the holding company of a group of companies involved in advertising and marketing communications throughout Australia and New Zealand.

#### Our Business

Clemenger operates across the marketing services spectrum with specialist companies offering clients best-of-category expertise in various disciplines, including traditional and digital advertising, public relations and public affairs, marketing technology, design and media, as well as specialised companies in the experiential marketing area, market research, field marketing, sales promotion and branded information advertising. The Clemenger Group employs approximately 1,900 staff across Australia and New Zealand.

Clemenger makes this statement on behalf of the following entities, which form the Clemenger Group.

Advertising Agencies	Specialised Services	Clemenger Consulting Network	Clemenger Media Group
CHEP Network	BrandWorld	GRACosway	Dynamo
Clemenger BBDO	Clemenger Field Marketing	GRA Partners	Foundation
Clemenger BBDO Wellington	Creative Activation	GRC Partners	OMD
Colenso BBDO	eg+	Porter Novelli	PHD
Marketforce	Hall & Partners		PHD New Zealand
Redhanded	LEVO		
Marketforce North	Perceptive Group		
Proximity New Zealand	Quantum Market Research		
	Raydar		
	Traffik Group		
	Flare		

Internationally, Clemenger forms part of the Omnicom Group, with Omnicom Inc. (**Omnicom**) owning a majority shareholding in the company.

The Board of Clemenger is accountable for the sound management of the Group's operations in Australia and New Zealand.

The Key Management Personnel and Senior Management of the agencies are responsible for day-to-day management and administration of Clemenger.

## **Our Supply Chain**

In complying with the Modern Slavery Act, we have conducted a review of our current supply chain, reviewing the suppliers that Clemenger have worked with over the last two years.

Based on our analysis of procurement categories, spend, geographic location and likelihood of forced labour, we have determined that the vast majority of our suppliers are located in Australia and New Zealand. They include media owners, media suppliers, research companies, technology service providers, software service providers, and operations involved in the production of marketing material. Relationships with suppliers are both short and long term in nature. Our key suppliers and partners operate in geographic locations and in industries where modern forms of slavery are and human trafficking are at a lower risk.

### **3. Potential Risks in our Operations and Supply Chain**

Clemenger has assessed risks that may possibly cause, contribute or be directly linked to modern slavery practices in our operations and supply chains. On the basis of our assessment, we consider that the risk of modern slavery practices in our operations and supply chains are relatively low. Nonetheless, Clemenger has reviewed its supply chain for areas of higher risk, with consideration given to sector and industry risks, product and services risks, and geographic risks.

Although Clemenger Group in a lower risk environment, we recognise that our operations are not risk free, and remain committed to ensuring that there is no modern slavery in our supply chains and business. We expect and require the same of all third parties we deal with.

### **4. Measures to Combat Modern Slavery**

#### **Policies and Code of Conduct**

Through our People and Policies document, Clemenger is committed to establishing and maintaining best practice environmental, safety and occupational health programs to promote the health and safety of our employees and the communities in which we operate.

We follow the code of conduct of our parent company, Omnicom. Omnicom's code of conduct addresses third-party relationships and reflects our commitment to acting ethically and with integrity in our business associations, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within our supply chains. The code of conduct, including guidance on business relationships, is accessible to our suppliers and staff.

A copy of Clemenger's People and Policies document and Omnicom's code of conduct can be supplied upon request.

We also review our policies and processes in an effort to ensure the highest standards in our supply chain (as expected by our customers and the companies with which we work), and to ensure that no form of forced labour or slavery is present in our business or our supply chain.

#### **Supplier Contract Terms and Reporting**

As part of its commitment to eliminating modern slavery, Clemenger requires suppliers and partners to:

- a. agree to our terms and conditions of supply, which state that our suppliers and partners must be in compliance with the Modern Slavery Act;
- b. keep sufficient records to enable Clemenger to verify the source of supply of any goods and/or services;
- c. upon request by Clemenger, provide Clemenger with reasonable access to its records and premises for the purposes of compliance with the Modern Slavery Act, including preparation of the annual modern slavery statement; and
- d. report to Clemenger any actual or suspected instances of modern slavery (as defined in the Modern Slavery Act) in the supply chain of any of its goods and services.

### **Due Diligence and Further Measures**

Clemenger obtains goods and services predominately from Australian and New Zealand suppliers who are reputable and ethical entities. Clemenger also monitors the location of each of its suppliers and ensures where possible that suppliers who are not located in markets with a higher risk of modern slavery occurring are selected.

To support and ensure the engagement of reputable entities, Clemenger has HR, audit and risk, finance and legal functions whose roles include assessing and ensuring such entities comply with both the relevant laws and Clemenger policies across the business. This process is accompanied by internal checks and balances, as all material contracts require sign off by senior management.

Clemenger will continue to review its operations and its procurement of goods and services to monitor and identify whether there are risks relating to modern slavery which Clemenger may then be able to mitigate.

### **5. Ongoing monitoring and consultation**

In order to assess the ongoing effectiveness of its measures to combat modern slavery, Clemenger takes the following steps:

- a. we audit our policies relevant to modern slavery on an annual basis to assess performance against established industry benchmarks, and update them as required;
- b. we conduct periodic reviews of our organisation and supply chain structures and assess whether there are any changes to the level of risk of modern slavery; and
- c. we provide communications and guidance to Clemenger entities as part of our ongoing assessment and for the purposes of determining any further steps required to address the risks of modern slavery within their organisations and supply chains.

Pursuant to the submission of this statement, Clemenger has reviewed our policies and conducted a review of our organisation. No issues or risks related to modern slavery were identified.

This statement has been approved by the Board of Directors of Clemenger Group Limited on 24 August 2022.

*Adrian Ciabotti*

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Director

Clemenger Group Limited