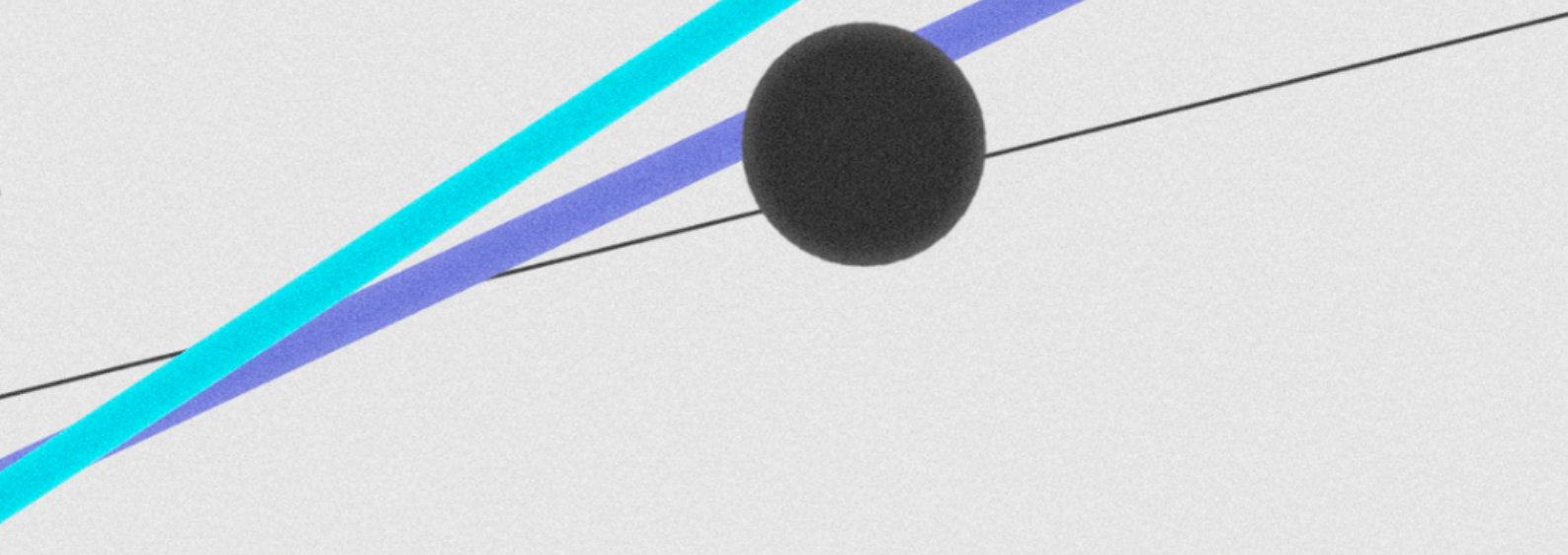




Modern Slavery Statement

In accordance with the Modern Slavery Act 2018 (Cth)

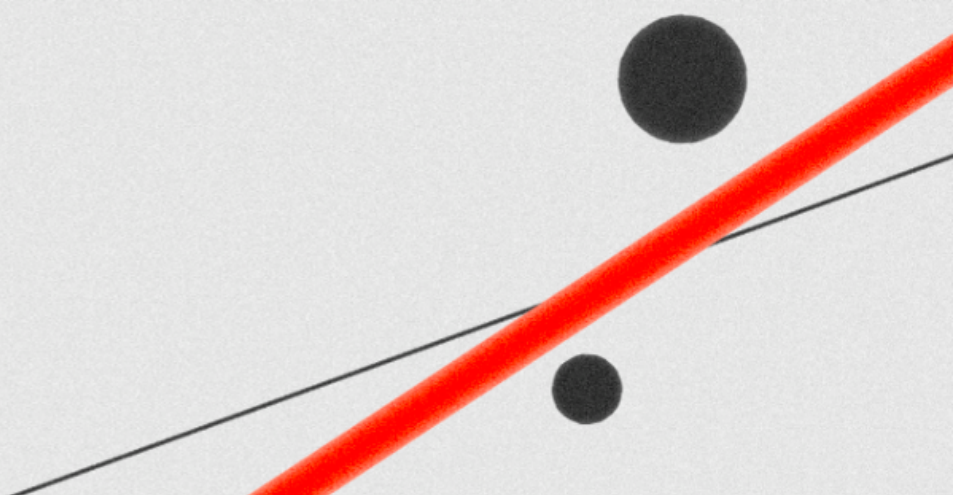
Dentsu International Australia Pty Ltd

5th Edition, Financial Year ending 2024

INNOVATING TO IMPACT



dentsu



This Modern Slavery Statement has been prepared by dentsu International Australia Pty Ltd (ACN 147 291 674) of Level 7, 510 Church Street, Cremorne VIC 3121 Australia **(dentsu Australia, our, us)** in fulfilment of its and its subsidiaries' obligations under the Modern Slavery Act 2018 (Cth).

References to dentsu Australia within this Statement are references to dentsu International Australia Pty Ltd and its subsidiaries unless otherwise stated.

This is our fifth Modern Slavery Statement for dentsu Australia's financial year ending 31 December 2024, as of 31 December 2024. It describes dentsu Australia's modern slavery and human trafficking statement up to the date of publication of this Statement.

This statement was approved by the board of dentsu International Australia Pty Ltd on 25 June 2025.



Patricio De Matteis
Director



James Millen
Director

Feedback

We value your feedback. For any questions or comments about this Statement, please email hello.APAC@dentsu.com

Responsible Disclosure

This statement will be submitted for publication on the Australian Government's Modern Slavery Statements Register.

Acknowledgement of Country

We acknowledge the traditional custodians of the land in which dentsu operates and pay our respect to their Elders past, present and future. As a network that works across many locations, we are honoured to operate on traditional land and acknowledge the important role Aboriginal and Torres Strait Islander Peoples continue to play within the community.

We are responsible for listening, learning and walking alongside First Nations people so that our activities support their ongoing connection to their lands, waters, culture, languages and traditions.

Introduction

At dentsu, we believe we must be a force for good. Our purpose: “an invitation to the never before” and vision: “to be at the forefront of people-centred transformations that shape society,” form the cornerstone of our value creation model, underpinned by our commitment to respect human rights and protect the interests of our employees and value chain.

Dentsu operates according to established principles of good governance and is committed to conducting business with integrity and to the highest ethical standards. As such, dentsu has zero tolerance for modern slavery and human trafficking in any form and is committed to doing all it can to ensure no form of slavery or human trafficking exists within its value chain. Dentsu expects the same of its clients, partners and suppliers and will not knowingly engage with any person or organisation suspected of being involved in modern slavery or human trafficking in any form.

Our Structure and Operations

Dentsu is a global network of powerhouse agencies and an integrated and transformation partner to the world’s leading organisations. At a global level, it delivers end-to-end experience transformation (Ex) by integrating its services across Media, CXM and Creative, while its business transformation (Bx) mindset pushes the boundaries of transformation and sustainable growth for brands, people and society.

EXPERIENCE TRANSFORMATION (EX)		BUSINESS TRANSFORMATION (BX)	
CREATIVE, CONTENT & DESIGN • Audience, Insights, Strategy • Campaign development • Visual design, motion, graphics • Identity system, digital design	MEDIA & COMMUNICATIONS • Audience, Insights, Strategy • Communications Planning and Innovative Ideas • Media Activation (Brand X Performance) • Media Effectiveness	EXPERIENCE DESIGN & PRODUCT INNOVATION • Ecosystem, Experience and Content Strategy • Service Design & Product Innovation • Experience, Interface and Content Design • Physical & Emerging Experiences	DIGITAL PLATFORMS & ENGINEERING • Architecture & Cloud Strategy • Commerce & Content Platforms • Marketing Technology & Consumer Data Platforms • Experience & Cloud Engineering
CONTENT PRODUCTION • Studio & digital production • Adaptation & Global Transcreation • Digital asset management • Creative APIs & Plug in	PERFORMANCE & RETAIL MARKETING • SEO, SEM, Social, Digital • Retail Media • UX, CRO, DCO • Commerce	ENGAGEMENT & LOYALTY • Loyalty Strategy & Program Execution • Digital Messaging, Marketing, And Service • Promotions, Gamification, And Experiential Marketing • Social & Search Commerce	ANALYTICS & INSIGHTS • Product & Commerce Intelligence • Consumer Identity & Experience Insights • Market Intelligence & Media Analytics • Data Science & Artificial Intelligence

Dentsu International Australia Pty Ltd (**dentsu Australia**) is a private limited company incorporated in Australia. It is a wholly owned subsidiary of dentsu International Limited (**dentsu International**), a company registered in England and Wales. Its ultimate parent company is dentsu Group Inc., incorporated in Japan (**dentsu**).

Dentsu International produces a Modern Slavery statement in accordance with section 54(1) of the UK Modern Slavery Act 2015, which is available here: <https://www.dentsu.com/our-policies/modern-slavery-act>

In 2023, dentsu completed the acquisition of the TAG Group. The TAG group produces a separate joint statement in accordance with section 54(1) of the UK Modern Slavery Act 2015 and section 16(1) of the Australia Modern Slavery Act 2018 (Cth), which is available here: <https://www.tagww.com/modern-slavery/>

Reporting Entities

Dentsu Australia is the parent company for dentsu Australia's operations in Australia. In 2024, it employed approximately 847 staff members across five office sites in the country.

Dentsu Australia's service offering in Australia includes leading media, creative, customer experience management and sports marketing capabilities, via our network of agency brands. Our local brands include Carat, iProspect, dentsu X, SMG Studio, Merkle, Dentsu Creative and MKTG.

As a minority shareholder in the Indigenous social change agency Cox Inall Ridgeway Pty Ltd (**Cox Inall Ridgeway**), dentsu Australia was responsible for managing the operations of Cox Inall Ridgeway, including oversight of its supply chain, up until October 2024.

In 2024, the processes at Cox Inall Ridgeway were reviewed to ensure the agency could be supported by a network of Indigenous suppliers, with the aim of fostering the sustainability and growth of Indigenous businesses across Australia. From November 2024, Cox Inall Ridgeway took full operational control of its own processes, enabling the agency to further align its operations with its principles and foundations as a majority-owned and controlled Indigenous business.

Dentsu Australia practices a collaborative operating model and structure, which enables our people to work across campus offices between various co-located brands. Our campus offices are located below, with the approximate number of employees;

- Melbourne, Victoria 326 employees
- Sydney, New South Wales 357 employees
- Brisbane, Queensland 66 employees
- Perth, Western Australia 24 employees
- Adelaide, South Australia 34 employees

The complete list of dentsu Australia's owned and controlled entities as at 31 December 2024 is set out in Appendix 1 to this Statement.

Supply Chain

Globally, dentsu's network consists of approximately 160 companies in Japan and six global leadership brands in international markets. It operates in approximately 120 countries and regions and has approximately 71,000 staff members.

Locally, dentsu Australia works with suppliers across diverse services within and outside Australia. These suppliers are categorised based on spend profile.

Corporate and operations supply chain spend profile

- Facilities management and office suppliers, including cleaning and catering providers
- Travel agents and transport operators
- Professional services, such as legal, financial and recruitment services
- Contingent labour workforce

Client and direct supply chain spend profile

- Media owners and publishers
- Research and data companies
- Technology, software and hardware service providers
- Photographic and creative service suppliers
- Printing and production suppliers

As a preference, dentsu Australia engages with local suppliers based in Australia.

Modern Slavery Risks

At a global level, dentsu is committed to upholding all internationally recognised human rights and UN Guiding Principles on Business and Human Rights in every aspect of our operations.

Within our operations

Within Australia, dentsu Australia employees and the contingent labour workforce are predominantly advertising professionals, supported by corporate functions engaged in accordance with applicable labour laws and modern award requirements. Due to dentsu Australia's adherence to global dentsu Group policies and dentsu's recruitment, remuneration, and compliance programs, there is no risk of modern slavery within our Australian operations.

Dentsu Australia's group operations include professional services provided in other regions, including India and New Zealand, which dentsu Australia utilises from time to time. These do not pose a modern slavery risk given the type of roles in scope and mandatory compliance within broader dentsu Group policies regarding applicable labour laws and employment standards.

Within our supply chains

Dentsu Australia's modern slavery risk within its supply chain remains low. Our supply chain does not involve sectors in which modern slavery typically or historically exists. However, we recognise that the risk is not non-existent. Dentsu Australia's primary suppliers are mature corporate organisations in the creative, media and data technology sectors.

Across our supply chain, we have identified that the possible risk of modern slavery arises within two key areas of our supply chain:

- a. Third-party facilities management and office suppliers (Facilities Supplier): cleaning services and providers are considered higher risk due to the prevalence of unskilled or temporary labour in this sector.
- b. Third-party event, activation and creative service providers based in Australia (Activation and Production Suppliers): service providers within this sector were considered moderately higher risk due to their reliance on a contractor-based workforce.

Actions to Address Risks of Modern Slavery

"We honour internationally recognised principles of human rights. Abuses that contravene those rights will not be tolerated within our business or those of our business partners." - Dentsu Group Code of Conduct

a) Modern Slavery Risk Governance

Respect for human rights underpins our purpose and value creation in relation to the realisation of the society we aspire to create. It has senior sponsorship, with our Global Chief Governance Officer overseeing our Group human rights program, and our Heads of Human Rights responsible for overseeing day-to-day implementation.

Human rights are a standing agenda item at the Executive-level Group Sustainability Committee, which meets four times a year. The Head of Human Rights works closely with our Global Functions teams—including Human Resource, Legal & Compliance, Procurement, Communications, and Brand Assurance—to embed human rights considerations, provide expertise, and build capacity for managing human rights risks.

In dentsu Australia's operations, human rights and modern slavery considerations are represented at the functional working group, which includes teams from Legal & Compliance, Sustainability, Corporate Communications, Finance and Facilities Management.

The Group Ethics and Compliance function acts as a critical internal control, responsible for assessing, investigating, and reporting potential non-compliance issues, including risks related to modern slavery, raised by dentsu employees or identified within our supply chain.

b) **Global Policies and Standards**

Dentsu Australia operates based on a comprehensive set of Global policies that, amongst other matters, encapsulate the obligations under the Act. The dentsu policies that incorporate the values and objectives of the Act are as follows:

- **The Global Code of Conduct.** Dentsu is committed to conducting business with honesty and integrity and upholding high standards to protect the interests of its employees, clients, shareholders, stakeholders, and communities in which they work. All employees are required to confirm adherence to the Code of Conduct annually and behave consistently with its terms.

The code explicitly refers to our commitment to honour intentionally recognised principles of human rights and comply with applicable employment legislation, our zero-tolerance approach to all forms of slavery, including child labour, and our commitment to employ fair and transparent procurement practices.

- **The Group Supplier Code of Conduct.** This reflects dentsu's commitment to our employees, clients and stakeholders, and the obligations expected from our suppliers, affiliates, consultants, contractors and agents.

The Code explicitly states that suppliers must comply with applicable employment and human rights legislation and must have zero tolerance of modern slavery and human trafficking, including forced, bonded or compulsory labour.

- Suppliers must ensure that all employment is voluntary, and workers are not subjected to forced labour or any form of involuntary servitude. Employees must be free to terminate their employment per applicable laws and regulations.
 - Suppliers must not require employees to lodge deposits of money and shall bear all costs related to the recruitment process. Suppliers must not require employees to surrender any formal identification as a condition of employment.
 - Suppliers must provide all employees with a written employment agreement in a language that they can understand, containing clear terms and conditions of employment.
- **Global HR Policy.** This states dentsu's commitment to uphold fair employment practices and observe the laws that pertain to, among others, the prohibition of forced, compulsory and child labour and the laws relating to the elimination of any improper treatment or discrimination of employees.
 - **Global Speak Up Process.** This process encourages employees to raise, in confidence, any concerns they may have about suspected wrongdoing in the workplace, including any concerns regarding the risk of modern slavery or human trafficking. All employees are given training on the speak up process, including how and when to use it.

- **Group Human Rights Policy.** This is a publicly available policy on the dentsu website, and sets our commitment to embedding respect for human rights across our operations, defining the minimum expectations that everyone working for and with dentsu must comply with.

c) **Compliance Assurance Framework**

Locally, dentsu Australia ensures compliance with the global framework as detailed above, and also operates a local compliance assurance to monitor, prevent and remediate compliance risks. Key components of this include:

- **Annual Compliance Statement.** Each dentsu market CEO (including dentsu Australia CEO) is required to annually certify that the business has operated in compliance with all applicable policies, laws and regulations.
- **Risk and Compliance Committee.** This committee (comprised of key stakeholders, including the ANZ CEO and senior representation from finance, legal, and HR) meets regularly to identify, monitor, and remediate compliance risks affecting the business.

d) **Supply Chain Due Diligence**

We acknowledge that due diligence provides the most effective insights when conducted in concert with other measures, including regular supplier dialogue, seeking out worker voice and third-party risk intelligence.

During the reporting period (FY24), our priority has been to establish a dentsu Australia enterprise-wide due diligence process, building from the pilot due diligence review and engagement program conducted within the MKTG brand from the previous reporting period (FY23).

Our new supplier platform contains some globally consistent specific questions addressing modern slavery risk factors. As part of the screening process, certain suppliers who are determined to have a higher inherent risk on the basis of their responses will be screened for compliance and integrity risks.

e) **Grievance Mechanism**

At a global level, dentsu has developed a comprehensive, operational-level grievance mechanism in accordance with the UN Guiding Principles on Business and Human Rights and encourages all employees and external stakeholders to raise human rights concerns.

We provide various channels for employees and suppliers to raise concerns and grievances, including the Speak Up@dentsu portal. The externally operated Speak Up portal is free to use, confidential, and available 24/7 to all employees and suppliers. We have a zero-tolerance policy against retaliation of any kind against individuals who speak up in good faith.

We undertake thorough investigations into concerns raised, and where they are substantiated, we take appropriate remedial and corrective actions. In FY24, dentsu Australia has not recorded any SpeakUp or whistleblower incident pertaining to modern slavery risks in our operations and supply chain.

f) Training and Awareness

Globally, dentsu requires every full-time employee and contractor to complete the annual code of conduct declaration, which informs employees of the risk of modern slavery in the supply chain.

Assessing the Effectiveness of Actions Taken

The UN Guiding Principles on Business and Human Rights clearly expect companies to track the effectiveness of their responses to human rights impacts. This tracking is anticipated to include appropriate qualitative and quantitative indicators and draw on both internal and external feedback.

During the reporting period, dentsu undertook significant integration efforts across its global businesses, aligning Japanese and International Markets (IM) operations under the unified One Dentsu operating model. These changes included enhancements to how client services and delivery models are structured and executed.

We used this opportunity to continually refine our supply chain risk insights by advancing the rollout of our supplier portal, enabling more robust supplier registration and screening processes.

At the same time, we improved our internal reporting mechanisms against established processes, standards and external benchmarks such as Ecovadis, Dow Jones Sustainability Index (DJSI) and MSCI Global Sustainability Indexes.

For the next reporting period, FY 25, we will evaluate refinement of the effectiveness of our approach by considering our current processes in accordance with the following four main categories;

- a) Risk Assessment and Prevention,
- b) Remediation and Mitigation,
- c) Transparency and Accountability, and
- d) Capacity Building and Awareness

Consultation with Controlled Entities and Other Relevant Information

As an integrated business which operates through multiple brands and entities, the consultation between subsidiaries and brands of dentsu Australia has been an action critical not only to understand the differing manifestations of modern slavery risks across our operations, but also to embed new processes and tools to mitigate those risks effectively.

To achieve this, modern slavery discussions are set in dentsu Australia's Executive Leadership Team's (which includes the board) annual review agenda to consider any actual or perceived risk over Modern Slavery in dentsu Australia's operations and supply chain and the effectiveness of managing the risks.

The dentsu Australia Executive Leadership Team (which includes the board) are represented by key leaders from each practice area who manage subsidiaries and brands of dentsu Australia operations in Australia.

We have consulted with the relevant finance, legal and human resource functions of each of our subsidiary entities in preparing this FY24 statement. Our modern slavery response is uniform across all our subsidiary activities.

Engagement with External Stakeholders

Dentsu Australia is beginning its journey of deeper engagement on this issue and strongly emphasises learning from the collective experiences of industry partners and civil society groups.

We're open to participating in collaborative forums that bring together multiple stakeholders, all working toward the shared goal of addressing and eliminating modern slavery risks. As we move forward, we will continue to engage with our suppliers, employees and stakeholders to support meaningful progress across our operations and supply chain.

-end-

Appendix 1: List of actively trading subsidiaries during the reporting period

Company	Country of Incorporation / Formation	Remark
Cox Inall Ridgeway Pty Ltd	Australia	Minor equity shareholder, dentsu Australia managed its financial and operational processes until October 2024
Dentsu Creative Pty Ltd	Australia	
SMG Studio Pty Ltd	Australia	
Cox Inall Change Pty Ltd	Australia	
Dentsu X Australia Pty Ltd	Australia	
MKTG Sport & Entertainment Pty Ltd	Australia	
Dentsu Access Pty Ltd	Australia	
Dentsu (ANZ) Management Pty Ltd	Australia	
Dentsu Media Investment Pty Ltd	Australia	
Dentsu Corporate Services Pty Ltd	Australia	
Amplifi Australia Pty Ltd	Australia	
Merkle ANZ Pty Ltd	Australia	
iProspect Pty Ltd	Australia	
Carat Australia Media Services Pty Ltd	Australia	