

Modern Slavery Statement

1. Introduction

This is the Modern Slavery Statement issued jointly by Multi Market Services Australia Holdings Pty Ltd (ACN 000 026 228) (“**MMS**”) and its subsidiaries Publicis Media Australia Pty Ltd (ACN 001 786 858) and Publicis Communications Australia Pty Ltd (ACN 001 720 921) (these entities together referred to as “**Publicis**”, “**we**” and “**our**”). This statement also includes consideration of the activities undertaken by Publicis Sapient Australia Pty Limited (ACN 082 145 891) and other subsidiaries of MMS.

Pursuant to the *Modern Slavery Act 2018* (Cth), this statement sets out the actions taken by Publicis to address risk relating to modern slavery within its business and supply chains for the year ended 31 December 2022.

2. Our Corporate Structure

Founded in 1926, Publicis Groupe (the “**Groupe**”) is the third largest international communications group in the world, operating in more than 80 countries, including Australia, France, the United States of America and the Netherlands.

In Australia, the operations of the Groupe include businesses providing services in the public relations, advertising, marketing and digital sectors including brand design, brand strategy, data management, customer analytics, media planning and buying, website and social media advisory services, digital business transformation, e-commerce and management consulting.

The Australian operations of the Groupe are conducted through the use of MMS as the holding company for the other Groupe entities which operate in Australia. During the reporting period, the entities operated through MMS were as follows:

- Publicis Sapient Australia Pty Limited (ACN 082 145 891).
- Publicis Communications Australia Pty Ltd (ACN 001 720 921).
- Publicis Media Australia Pty Ltd (ACN 001 786 858).
- Publicis Red Lion Pty Limited (ACN 098 273 539)
- Third Horizon Consulting Pty Ltd (ACN 163 267 614).
- Balance Internet Pty Ltd (ACN 130 025 393).
- Citrus Global Holdings Pty Ltd (ACN 615 424 096).
- Citrus International Pty Ltd (ACN 614 763 307).

Through the above entities, Publicis operates under the following business names in Australia: Publicis Sapient, ANZ HQ, Digitas Australia, HerdMSL, Leo Burnett Australia, Publicis Worldwide Australia, Saatchi & Saatchi Australia, Saatchi & Saatchi Wellness, BRAUS-Email Deployment, BRAUS-Loyalty, MDI Australia, Mediavest Spark Australia, Prodigious Australia, Publicis Media Executive Australia, Razorfish Australia, Re:Sources Australia BS, Re:Sources Australia IT, Starcom Australia, Zenith Australia, Publicis Red Lion Australia, Balance Internet Australia, Performics Australia, Arc, Team One and CitrusAd-AU.

This statement is made after consultation with the above entities, which due to the structure and management of the Groupe's operations in Australia utilise many of the same policies and processes and also have numerous shared suppliers.

Of the subsidiaries of MMS, only Publicis Media Australia Pty Ltd (ACN 001 786 858) and Publicis Communications Australia Pty Ltd (ACN 001 720 921) meet the consolidated revenue threshold required for mandatory reporting. This statement is made by MMS jointly with those entities and includes consideration of the operations of the other subsidiary entities of MMS which do not meet the mandatory reporting threshold. Due to the commonality of the policies, processes and supplies between entities, as well as the oversight of each of the entities owned by MMS by senior management personnel, it is appropriate to provide a single joint statement for each of those entities.

3. Our Supply Chain

We engage numerous suppliers in order to conduct our operations.

It is our preference to engage with local suppliers and for this reason we primarily use suppliers who are based in Australia. We also engage with overseas suppliers. These suppliers are primarily based in the United States of America, New Zealand and Singapore, however from time to time we engage with suppliers in countries including Canada, Denmark, Ireland, Germany, the United Kingdom, Ireland, Malaysia, Taiwan, Thailand, South Korea and India. These suppliers provide goods and services necessary for the operation of our business in categories including:

- production materials, production services and production studios;
- professional services, such as legal, research, financial, recruitment;
- talent acquisition;
- equipment hire;
- catering;
- building rental and facility management;
- media;
- office supplies;
- cleaning services;
- IT services;
- temporary labour services;
- travel; and
- employee benefits and healthcare.

4. Risks of Modern Slavery

At Publicis we take issues of slavery and human trafficking very seriously and are committed to preventing modern slavery in all of its forms from occurring. Due to the industry in which we operate, as well as the location of our operations, we continue to assess the risk of modern slavery issues arising in our supply chain as being minimal.

We engage approximately 1,900 employees based throughout Australia, primarily in New South Wales, Victoria and Queensland. We are committed to ensuring the terms and conditions of the employment of our employees are in compliance with all legal standards. To achieve this commitment, we have a significant human resources function

in place, together with workplace policies and procedures which are regularly reviewed to ensure compliance with all applicable workplace laws. These measures create substantial protection for our employees and as a result, the risk of modern slavery issues arising directly within our own workforce is virtually non-existent.

Though we have assessed the risk of modern slavery arising in our supply chain as minimal, we recognise that the risk is not non-existent. Considering our operations as a whole, we have assessed the primary risk of modern slavery issues arising is through Publicis becoming linked to modern slavery issues through the practices of suppliers with which we engage. We have identified that suppliers engaged by Publicis outside of Australia, as well as supplies engaged in higher risk industries, such as cleaning services, represent the greatest risk of modern slavery issues arising in our supply chains. We recognise this risk and have implemented processes with respect to our suppliers to minimise the chance of this risk eventuating.

Publicis recognises that modern slavery issues are a significant and ongoing concern and we will continue to take steps to further minimise the risk of modern slavery arising in our supply chains.

5. Reducing the Risk of Modern Slavery in our Supply Chain

In 2003 the Groupe was the first communications group in the world to sign the United Nations Global Compact. Principles 4 and 5 of the Global Compact deal directly with the elimination of child labour and all other forms of forced and compulsory labour. These principles are important to us and have been adopted in the way we conduct our operations.

We have a procurement team which directly manages a large number of our suppliers. This procurement team has robust and documented procurement processes in place for engaging with new suppliers managed by them, which involve due diligence checks being completed on all suppliers prior to their engagement. These checks include consideration of matters which may suggest a risk of modern slavery issues arising in the supply chain of that supplier.

Publicis has in place, and had in place throughout the reporting period, CSR guidelines with respect to the promotion of safe labour and fighting against modern slavery, human trafficking, child and forced labour and all forms of discrimination and violence. Prior to the engagement of potential suppliers managed by our procurement team, we require that each potential supplier undertake a CSR self-assessment which reflects these guidelines. This assessment aims to educate suppliers and requires representations from suppliers in relation to social and labour rights, business ethics (which includes human rights and issues related to modern slavery) and environment. Suppliers managed by our procurement team are also encouraged to complete a third-party CSR assessment which includes reference to human rights and related issues. Potential suppliers who do not comply with our CSR Guidelines will not be selected as suppliers.

Once suppliers are selected by our procurement team, the standard contractual terms utilised for our suppliers include a term that the supplier will comply with our CSR Guidelines and will implement equivalent standards within its organisation. Regardless of the contractual terms in place with a supplier, all of our procurement managed suppliers

are requested to adhere to our CSR Guidelines, including those guidelines with respect to safe labour and fighting against modern slavery.

To further minimise the risk of modern slavery issues arising in our supply chain, our procurement team conducts regular searches and checks in relation to existing suppliers to ensure no issues are discovered which may give rise to concerns regarding matters including modern slavery issues.

We also engage with other suppliers which are not managed by our procurement team, both on a day-to-day basis and in relation to specific projects or events. Due to the goods and services provided by these suppliers, we consider them to be at a low risk of being involved with modern slavery issues. Were we to become aware any supplier may involve modern slavery practices within its supply chain, we would not engage with, or would cease engaging with, that supplier.

6. Assessing Effectiveness of our Modern Slavery Mitigation Measures

Since the Groupe signed the United Nations Global Compact in 2003, we have continually assessed and modified our approach to dealing with corporate social responsibility and modern slavery matters. Over time this has involved changes to our procurement processes, the way suppliers are engaged as well as the information and representations required from suppliers.

We recognise that our response to modern slavery is an ongoing and evolving process and in order to uphold our commitment to fighting slavery and human trafficking in all of its forms, we will continually review the effectiveness of the measures we have implemented to minimise the risk of modern slavery within our supply chain. In doing so, we will also consider what further steps we can take to minimise these risks and to better understand how modern slavery can arise in our supply chain to allow it to be effectively addressed.

7. Consultation

We have consulted with the relevant procurement and human resources functions of each of our subsidiary entities in preparing this statement. Each of those procurement and human resources functions have confirmed the matters contained in this statement are true and correct.

8. Approval

This statement has been approved by the Board of Multi Market Services Australia Holdings Pty Ltd on 28 June 2023 on behalf of itself and its subsidiary companies, including Publicis Communications Australia Pty Ltd and Publicis Media Australia Pty Ltd.



Chris Procko
Director
Multi Market Services Australia Holdings Pty Ltd
28 June 2023