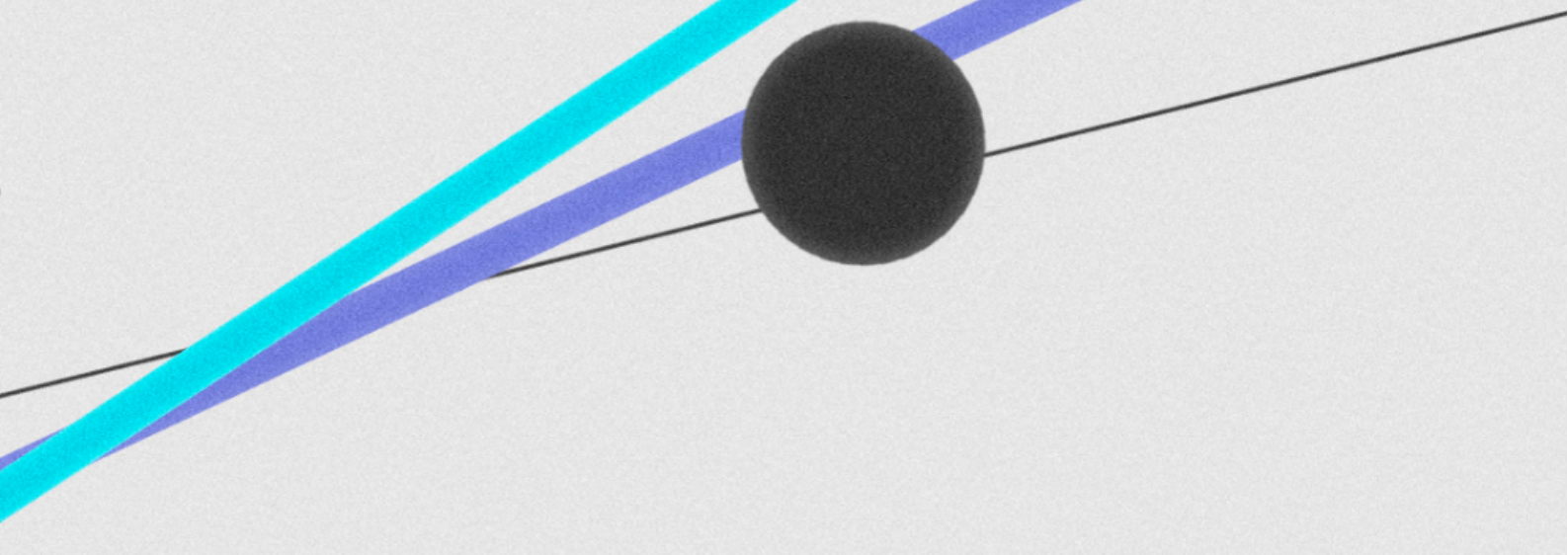




# Modern Slavery Statement

**In accordance with the Modern Slavery Act 2018 (Cth)**

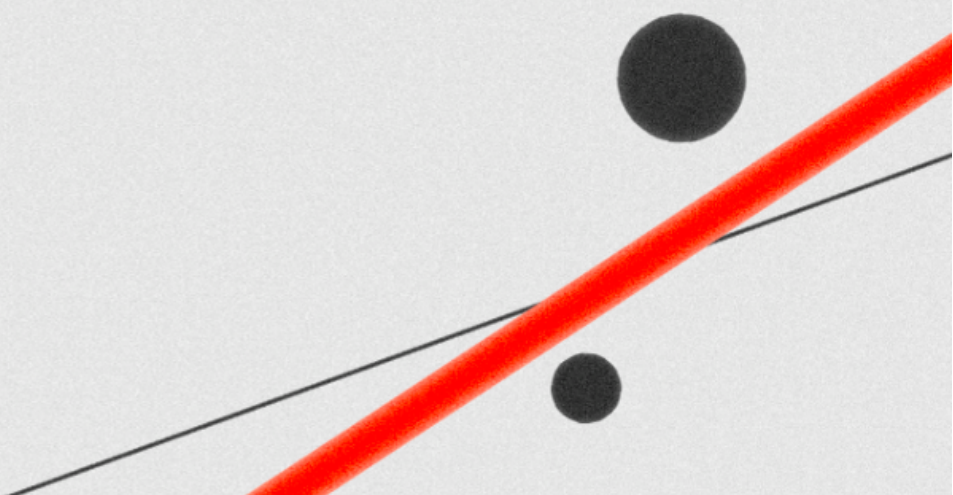
*Dentsu International Australia Pty Ltd*

*6<sup>th</sup> Edition, Financial Year ending 2025*

**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 sixth Modern Slavery Statement for dentsu Australia's financial year ending 31 December 2025, as of 31 December 2025. 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 2026.



James Millen  
Director

### **Feedback**

We value your feedback. For any questions or comments about this Statement, please email [sustainability.apac@dentsu.com](mailto:sustainability.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,” guide how we create value for clients, employees and communities. Respect for human rights is fundamental to this approach.

We operate according to established principles of good governance and are committed to conducting business with integrity and to the highest ethical standards.

We have zero tolerance for modern slavery and human trafficking in any form and are committed to taking appropriate steps to identify, prevent and address these risks across our operations and value chain.

We expect the same commitment from our 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 transformational 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)                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>CREATIVE, CONTENT &amp; DESIGN</b> <ul style="list-style-type: none"> <li>• Audience, Insights, Strategy</li> <li>• Campaign development</li> <li>• Visual design, motion, graphics</li> <li>• Identity system, digital design</li> </ul> | <b>MEDIA &amp; COMMUNICATIONS</b> <ul style="list-style-type: none"> <li>• Audience, Insights, Strategy</li> <li>• Communications Planning and Innovative Ideas</li> <li>• Media Activation (Brand X Performance)</li> <li>• Media Effectiveness</li> </ul> | <b>EXPERIENCE DESIGN &amp; PRODUCT INNOVATION</b> <ul style="list-style-type: none"> <li>• Ecosystem, Experience and Content Strategy</li> <li>• Service Design &amp; Product Innovation</li> <li>• Experience, Interface and Content Design</li> <li>• Physical &amp; Emerging Experiences</li> </ul> | <b>DIGITAL PLATFORMS &amp; ENGINEERING</b> <ul style="list-style-type: none"> <li>• Architecture &amp; Cloud Strategy</li> <li>• Commerce &amp; Content Platforms</li> <li>• Marketing Technology &amp; Consumer Data Platforms</li> <li>• Experience &amp; Cloud Engineering</li> </ul>  |
| <b>CONTENT PRODUCTION</b> <ul style="list-style-type: none"> <li>• Studio &amp; digital production</li> <li>• Adaptation &amp; Global Transcreation</li> <li>• Digital asset management</li> <li>• Creative APIs &amp; Plug in</li> </ul>    | <b>PERFORMANCE &amp; RETAIL MARKETING</b> <ul style="list-style-type: none"> <li>• SEO, SEM, Social, Digital</li> <li>• Retail Media</li> <li>• UX, CRO, DCO</li> <li>• Commerce</li> </ul>                                                                 | <b>ENGAGEMENT &amp; LOYALTY</b> <ul style="list-style-type: none"> <li>• Loyalty Strategy &amp; Program Execution</li> <li>• Digital Messaging, Marketing, And Service</li> <li>• Promotions, Gamification, And Experiential Marketing</li> <li>• Social &amp; Search Commerce</li> </ul>              | <b>ANALYTICS &amp; INSIGHTS</b> <ul style="list-style-type: none"> <li>• Product &amp; Commerce Intelligence</li> <li>• Consumer Identity &amp; Experience Insights</li> <li>• Market Intelligence &amp; Media Analytics</li> <li>• Data Science &amp; Artificial Intelligence</li> </ul> |

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. 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/>

This statement should be read in conjunction with the above statements to provide a comprehensive overview of dentsu's approach to identifying, managing and mitigating modern slavery risks across its operations and supply chain.

## Reporting Entities

Dentsu Australia is the parent company for dentsu Australia's operations in Australia. In 2025, it employed approximately 806 staff members across five office sites and co-working spaces 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.

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, 261 employees
- Sydney, New South Wales, 354 employees
- Brisbane, Queensland, 76 employees
- Perth, Western Australia, 27 employees
- Adelaide, South Australia, 34 employees
- Employees hosted at co-working spaces, 54 employees

The complete list of dentsu Australia's owned and controlled entities as at 31 December 2025 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 as at 31 December 2024. The Group operates in about 120 countries and markets and employs around 68,000 people worldwide.

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

### Corporate and operations supply chain spend profile

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

### Client and direct supply chain spend profile

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

As a preference, dentsu Australia engages with local Australian suppliers.

## **Modern slavery risk within our operations and supply chain**

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 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. In addition, dentsu Australia operates under dentsu Group's global policies, recruitment practices, remuneration frameworks, and compliance programs, which are designed to promote fair labour practices and support the prevention of modern slavery risks.

Dentsu Australia's operations are supported by professional services provided by other dentsu Group entities, including those in India, the Philippines, New Zealand and wider Asia Pacific. The risk of modern slavery within these arrangements is assessed as low, having regard to the professional nature of the services provided, and the application of dentsu Group's employment policies and labour standards.

Dentsu Australia forms part of the APAC regional structure, with certain people and workforce-related functions supported at a regional level from Singapore and Australia. This regional approach facilitates the consistent implementation of dentsu Group policies, employment standards and people practices across the region.

### Within our supply chains

We assess the overall risk of modern slavery within our Australian supply chain as low. However, we recognise that modern slavery risks can exist across all sectors and

industries. While our primary suppliers are mature organisations operating in the creative, media and data technology sectors, we continue to monitor and assess supplier categories that may pose a greater inherent risk of modern slavery.

Across our supply chain, we have identified two areas with heightened potential for modern slavery risks that warrant additional attention.

- a. Third-party facilities management and office suppliers (**Facilities Supplier**): cleaning services and related providers are considered to present a higher inherent risk of modern slavery due to the prevalence of low-skilled, temporary, and subcontracted labour within the sector. To help manage this risk, dentsu applies supplier selection criteria that include consideration of suppliers' modern slavery commitments and disclosures, and engages cleaning contractors that maintain and publish Modern Slavery Statements where applicable.

During 2025, dentsu also undertook workplace upgrade works that required the engagement of external contractors. To manage these risks, dentsu engaged established, reputable contractors and conducted appropriate due diligence prior to the commencement of works.

- b. Third-party event, activation, and creative service providers based in Australia (**Activation and Production Suppliers**): these service providers were considered to present a moderate inherent modern slavery risk due to their reliance on temporary, freelance, casual, and subcontracted labour arrangements, which may reduce visibility into workforce practices and employment conditions. To manage these risks, dentsu applies its established supplier due diligence and procurement processes when engaging with and overseeing suppliers in this category.

## **Actions to Address Risks of Modern Slavery**

### **a) Modern Slavery Risk Governance**

Modern slavery risks are considered a subset of the Human Rights agenda within dentsu Group. The human rights governance is supported by senior leadership oversight. The Global Chief Corporate Affairs Officer (formerly Global Chief Governance Officer) and the Global General Counsel oversee dentsu's global human rights program, while the Head of Strategic Governance is responsible for its day-to-day implementation.

Human rights remain a standing agenda item at the Executive-level Group Sustainability Committee, which meets quarterly. The Head of Strategic Governance works closely with our Global Functions teams, including Human Resources, Legal & Compliance, Procurement, Communications, and Brand, to embed human rights considerations, provide subject-matter expertise, and build capacity to manage human rights risks.

Within dentsu Australia, human rights and modern slavery considerations are overseen through a cross-functional working group comprising representatives from Legal & Compliance, Sustainability, Corporate Communications, Finance and Facilities Management.

The Group Ethics and Compliance function serves as a key 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 under a comprehensive set of Global policies that, among other matters, encapsulate its 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 to upholding high standards to protect the interests of its employees, clients, shareholders, stakeholders, and the communities in which it works. All employees are required to confirm adherence to the Code of Conduct annually and behave consistently with its terms.
- **The Group Supplier Code of Conduct.** This reflects dentsu's commitment to our employees, clients and stakeholders, as well as the obligations expected of 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.

- **Global HR Policy.** This states dentsu's commitment to upholding fair employment practices and observing laws that pertain, among others, to the prohibition of forced, compulsory, and child labour, and 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 that sets out our commitment to embedding respect for human rights across our operations and defines the minimum expectations that everyone working for and with dentsu must meet.

The policy is informed by the following international instruments and industry principles:

- Universal Declaration of Human Rights International Covenant on Civil and Political Rights
- International Covenant on Social, Economic and Cultural Rights
- United Nations Guiding Principles for Business and Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct
- United Nations Global Compact Principles

- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- United Nations Convention on the Rights of the Child

c) **Compliance Framework**

- **Dentsu's Governance Policy** ensures that all Group and local policies are developed, reviewed and communicated in a consistent and controlled manner. Each policy is approved through a defined governance structure – overseen by the Group Management Board (GMB), the Chief Corporate Affairs Officer, or delegated members of the Group Management Team.

Policy owners are accountable for policy development, review, and dissemination, with support from the Global Communications and Regional Management teams to ensure timely awareness and translation across priority languages and markets.

- **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 Assessment**

We recognise that due diligence is most effective when complemented by other measures, including ongoing supplier engagement, consideration of worker perspectives and the use of independent risk intelligence to identify and assess potential modern slavery risks.

During the reporting period (FY25), dentsu Group continued to strengthen visibility across key procurement categories, including technology, hardware and software, through the ongoing integration and harmonisation of supplier data.

Given the dynamic nature of the Group's supplier base across markets, the locations of key suppliers were mapped against the Walk Free Foundation's Global Slavery Index to help prioritise further due diligence activities. More than 70% of these suppliers are located in the UK, the US, Japan, and Germany and are assessed as presenting low- to medium-inherent modern slavery risks.

Dentsu Australia continues to consider learnings from the Group-level assessment and will assess opportunities to further strengthen its market-level due diligence and supplier management processes over time.

e) **Grievance Mechanism**

At a global level, dentsu has established an operational-level grievance mechanism aligned with the UN Guiding Principles on Business and Human Rights and encourages employees, suppliers, and other external stakeholders to raise concerns regarding human rights and modern slavery.

Dentsu provides a range of channels for employees and suppliers to raise concerns and grievances, including the Speak Up@dentsu portal. The externally managed portal is available 24/7, is free to access and allows concerns to be raised confidentially.

Dentsu maintains a zero-tolerance approach to retaliation of any kind against individuals who speak up in good faith. All reported concerns are assessed and investigated as appropriate, with remedial and corrective actions implemented where concerns are substantiated.

#### **f) Training and Awareness**

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**

Dentsu continued its global integration initiatives commenced in FY24, with a focus on strengthening and streamlining its operating model and client service delivery capabilities. As suppliers were onboarded to the improved financial reporting and procurement systems during FY25, we continued to apply supplier management and monitoring processes, including oversight of potential modern slavery risks within our supply chain.

We also continued to monitor completion rates for mandatory employee training programs to strengthen awareness of human rights, modern slavery risks, and the effective application of internal policies and procedures.

Throughout the reporting period, we continued to review our governance frameworks, supplier engagement processes and employee awareness initiatives to support the ongoing identification and management of modern slavery risks. During FY25, no modern slavery concerns were reported through our Speak Up or whistleblower channels.

## **Consultation with Controlled Entities and Other Relevant Information**

As an integrated business that operates through multiple brands and entities, consultation between the subsidiaries and brands of dentsu Australia has been 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 included in dentsu Australia's Executive Leadership Team's and Board's annual review agenda to consider any actual or perceived risks of Modern Slavery in dentsu Australia's operations and supply chain, and the effectiveness of managing these risks.

The dentsu Australia Executive Leadership Team 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 FY25 statement. Our modern slavery response is uniform across all our subsidiary activities.

## **Engagement with External Stakeholders**

We recognise that addressing modern slavery requires ongoing learning and collaboration. We continue to engage with industry peers, suppliers and civil society organisations to strengthen our understanding of emerging risks and effective approaches to prevention and remediation.

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.

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

| <b>Company</b>                         | <b>Country of Incorporation / Formation</b> | <b>Remark</b>                                                                                                            |
|----------------------------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| Cox Inall Ridgeway Pty Ltd             | Australia                                   | Dentsu owns a minority share of 49%. Dentsu's modern slavery statement does not cover the operations within this entity. |
| 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                                   | MKTG employees are based in co-working spaces across Sydney and Melbourne.                                               |
| Dentsu Access Pty Ltd*                 | Australia                                   |                                                                                                                          |
| Dentsu (ANZ) Management Pty Ltd        | Australia                                   |                                                                                                                          |
| Dentsu Media Investments 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                                   |                                                                                                                          |
| Scorch Pty Ltd (SearchFound Pty Ltd)*  | Australia                                   |                                                                                                                          |
| Klip Desk Holdings Pty Ltd*            | Australia                                   |                                                                                                                          |

(\*) Company and/or entities that are dormant and do not have active operations during the reporting year