

Modern Slavery Statement

Introduction

This is the Modern Slavery Statement for Sensis Pty Ltd ABN 30 007 423 912 (**Sensis**) for financial year 1 July 2019 to 30 June 2020, prepared pursuant to the Modern Slavery Act 2012 (Cth). Sensis' registered office is located at Level 9, 222 Lonsdale Street, Melbourne, Victoria.

Our structure and operations

Sensis is a provider of advertising, marketing and data services to Australian businesses. Sensis trades under its Yellow / Yellow Pages, White Pages, Whereis and Sensis Data Solutions brands. Its subsidiaries, Australian Local Search Pty Ltd trades under the True Local brand and Life Events Media Pty Ltd under the Found Digital brand. Australian Local Search Pty Ltd also operated the Skip pre-order and pay application until March 2020. These companies are together referred to as the Sensis Group.

Sensis is the primary operating entity which manages sales and servicing (including through its call centre) as well as corporate functions for the Sensis Group. Sensis employs approximately 400 employees, with the majority working from our headquarters located in Melbourne. We also have a smaller number of corporate staff and face to face sales people and account managers located in other Australian states and territories.

Our supply chains

Sensis has a global supply chain consisting of over 250 contracted suppliers to support our operations and business. The sourcing and purchasing of goods and services is managed by our finance and procurement teams based in Australia.

In FY20, our suppliers were predominantly located in Australia, USA and Singapore. Our suppliers provide goods and services across these key categories:

- Print and distribution – Directory printing services and associated distribution services. Predominantly purchased from suppliers located in Australia, Singapore and Finland with labour and materials mainly sourced from Finland, Singapore and Malaysia.
- Fulfilment, sales and servicing – This includes outsourced business processes and functions such as sales, contact centre and fulfilment services. Predominantly purchased from suppliers located in Australia, USA and India and labour mainly sourced from the same countries.
- IT supplies and services – This includes digital services, IT equipment, software, cloud based services, Software as a Service and IT managed services to support our operations and business. Predominantly purchased from suppliers located in Australia, USA and Germany and labour mainly sourced from the same countries.
- Professional services – This includes labour hire, consultancy and advisory services and specialist contractors to assist the business with IT projects, software development and IT operations. Predominantly purchased from suppliers located in Australia, with labour mainly sourced from Australia, the Philippines and India.

- Corporate services – This includes property leases, facility management, general office supplies, telecommunication, human resources, legal services, travel, catering, recruitment and other employee services. Predominantly purchased from suppliers located in Australia, with labour mainly sourced from Australia.
- Marketing and public relations – This includes advertising, corporate events, signage and merchandise, social media services, public relations and communication services. Predominantly purchased from suppliers located in Australia, with labour mainly sourced from Australia.

Potential risks in our operations and supply chains

As a marketing, advertising and data services firm located in Australia with a largely professional workforce, we consider the risk of modern slavery in our own operations to be low.

However, to ensure that we minimise the risk of modern slavery across our supply chain, we developed a risk assessment matrix which factors geographic location, industry, types of goods or services supplied, reputation and past conduct, and business models when assessing the level of risk in our broader supply chain.

We have assessed all of the products and services that we procure using our risk assessment matrix, and identified that those within the categories of IT supplies and services, outsourced sales, call centre and fulfilment services have a higher innate risk of modern slavery.

We have not identified any instances of modern slavery in our operations or supply chain.

Our approach

The Sensis Group does not tolerate modern slavery in any part of our business and we are committed to ensuring it does not take place in our supply chains. We have implemented a robust framework to mitigate the risk of modern slavery occurring, alongside our existing systems and controls.

We have formal policies in place that reflect our aim to act transparently, respectfully and with integrity in all our business relationships. These include our [Code of Conduct](#), our [Whistleblower Protection Policy](#) and our independent and confidential reporting service, [STOPLine](#) which is available to our employees and contractors.

Our Modern Slavery Working Group (comprised of our Legal, Procurement and Compliance teams) was responsible for the development and implementation of the Sensis Group's modern slavery policies and procedures.

Our policies and procedures to combat modern slavery include:

- **Modern Slavery – Procurement Plan:** Introduction of a due diligence process which includes a modern slavery risk assessment framework and requirement for suppliers assessed as higher risk to undertake a modern slavery questionnaire. We also communicate our expectations to suppliers through our [Supplier Code of Conduct](#) and including a requirement to comply in our standard contractual terms.
- **Modern Slavery – Remediation Plan:** Introduction of a remediation process under which our Compliance team is responsible for managing any modern slavery risks identified in completed modern slavery questionnaires, reported by suppliers or is otherwise brought to Sensis'

attention. This include assessing reported instances of modern slavery, working with suppliers to ensure the adequacy and/or appropriateness of remediation plans and restoration plans (to assist victims of modern slavery practises) and monitoring corrective actions in accordance with our internal guidelines.

- **Modern Slavery Policy:** Introduction of a Modern Slavery Policy to reflect our commitment to tackling modern slavery and encourage our personnel (both employees and external workers) to raise any concerns they may have about modern slavery practices occurring within our organisation or our supply chain. Our personnel can report their concerns to their manager, the Compliance team or in accordance with our Whistleblower Protection Policy. We are committed to supporting our personnel who raise genuine concerns under our Modern Slavery Policy.

Measuring effectiveness

Our Modern Slavery Working Group continues to review, develop and modify our approach to combating modern slavery to ensure we meet our aims and the highest ethical standards. Our policies and processes are designed to help us track their effectiveness, including to identify and remediate instances of modern slavery and to assist victims as well as assessing the effectiveness of these actions.

Consultation across the Sensis Group

All companies within the Sensis Group operate under the same management structure reporting to the Sensis' Chief Executive Officer who has reviewed and approved this Modern Slavery Statement.

Our goals for FY22

Our goals for this financial year to implement our Modern Slavery – Procurement Plan when dealing with all new and recontracting suppliers and to commence targeted Modern Slavery awareness training to our personnel who work with our suppliers in those categories where we have identified a higher risk of modern slavery.

This statement has been approved by the Board of Sensis Pty Ltd on March 30, 2021



John Allan
Chief Executive Officer, Sensis Pty Ltd
March 31, 2021