

MODERN SLAVERY

JCDecaux

Act Statement 2020



INTRODUCTION



Founded in 1964, JCDecaux invented the concept of street furniture in Lyon, France, which quickly became a global advertising phenomenon.

JCDecaux has since become the world's number one Out-of-Home advertising group with presence in 83 countries. JCDecaux reaches over 410 million people worldwide every day, across more than 1 million advertising panels.

Across our organisation, operations and supply chains, we have an uncompromised commitment to human and labour rights, the continuous protection of our environment, and unwavering business integrity.

This commitment includes the eradication of modern slavery in its many forms, such as forced or child labour.

We endeavour to identify and address these practices if they occur, through robust due diligence and risk management processes, and a culture that encourages people to speak up when they see or feel something is not right.

JCDecaux is passionate about enhancing the cities and environments in which we operate. We aim to do this in the most environmentally sustainable and socially responsible manner, while delivering thoughtful amenity, innovation and beautiful design.

STRUCTURE AND OPERATIONS

This Modern Slavery Statement is submitted by JCDecaux Australia Holdings Pty Ltd ABN 50 627 855 323 (JCDecaux). JCDecaux is the holding company of the JCDecaux Australia and New Zealand corporate group (the Group). This Statement is a joint statement submitted on behalf of JCDecaux and the following Group companies:

- JCDecaux ANZ Pty Ltd (ABN: 26 627 855 663)
- APN Outdoor Group Pty Ltd (ABN:57 155 848 589)
- JCDecaux Australia Trading Pty Ltd (ABN: 49 059 604 278)
- JCDecaux Australia Pty Ltd as trustee for the JCDecaux Australia Unit Trust (ABN 73 619 936 326)

With the exception of JCDecaux Australia Pty Ltd, each of the above companies is a reporting entity for the purpose of the Modern Slavery Act. As a key trading company in the Group, JCDecaux Australia Pty Ltd has voluntarily adopted this Statement.

All companies in the Group are ultimately owned 100% by JCDecaux*. Group companies other than the reporting entities referred to above are not reporting entities for the purpose of the Modern Slavery Act. This statement however covers the operations and supply chains of all companies in the Group, for the reasons set out below.

JCDecaux is ultimately owned (100%) by JCDecaux SA incorporated in France.

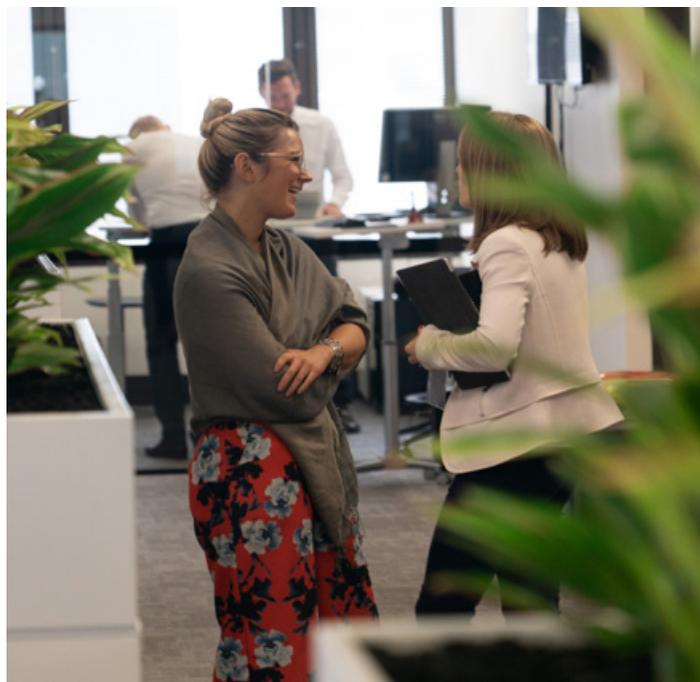
In Australia, the main operations of JCDecaux and its controlled entities involve the provision of Out-of-home advertising, including print, production, installation and maintenance of Out-of-home advertising structures. This includes the supply of advertising and non-advertising street furniture such as bus / tram shelters, public payphones and public bicycle rental systems. JCDecaux also supplies and operates large format advertising panels, as well as bus advertising. We operate over 50,000 advertising panels across Airport, Street Furniture, Roadside, Transit and Rail environments in Australia and New Zealand. Via its wholly-owned subsidiary, GSP Print Pty Limited, JCDecaux offers printing and production services to the out-of-home advertising industry. JCDecaux has nine offices nationally across five capital cities, in addition to our Auckland NZ office, employing over 450 staff members.

The Australia & New Zealand Group is managed as one business with a common Executive Leadership Team. There are common statutory directors plus local directors across all group entities in Australia, and

New Zealand, respectively. Back office sales and operational systems are aligned across all the entities. Advertising campaigns are sold across networks comprising advertising rights held in multiple group entities. The Group operates under universal policies, procedures and management systems. Suppliers and supply chains are common across the various trading entities in the Group.

For these reasons, JCDecaux believes it is appropriate to submit one Modern Slavery Statement covering all the entities in the Group. Where certain Group entities have different operations, for example the GSP Print business, the modern slavery implications of that business have been specifically considered as identified on pages 6 to 10 below, and internal consultation with relevant managers of these divisions has been undertaken.

With a commitment to integrity and excellence in service, JCDecaux is driven by innovation and beautiful design. As an organisation, our ambition is to be environmentally sustainable and socially responsive, working with our partners, clients and communities to enhance environments and the cities in which we operate.



** JCDecaux Australia Holdings Pty Ltd Group has non-controlling interests in several industry-controlled entities in Australia & New Zealand which are operated for the advancement of the out-of-home media industry generally in those countries. These industry entities are not considered part of the JCDecaux group for the purpose of this Statement and are not covered by the Statement.*

SUPPLY CHAINS



JCDecaux's Australian & New Zealand supply chains include:

- Suppliers of components to build and maintain advertising assets and panels. JCDecaux acquires digital screens and electronic components from both local and international suppliers to construct and maintain digital advertising panels.
- Suppliers of components to build and maintain Street Furniture (bus shelters, bike stations) and bikes.
- Specific to advertising assets and panels, we engage service suppliers including engineering consultants, asset installers, advertising installation services, and contracted cleaners.
- In relation to the supply of printed advertising on non-digital advertising assets, our suppliers include suppliers of substrates (materials) and printing equipment.
- Suppliers of IT infrastructure, software and IT equipment.
- General suppliers including for office equipment, consumables and clothing.
- General services including telecommunication services, freight, consultancy (marketing, legal and external consultancy), photography, office cleaners and travel providers.

Our suppliers are predominantly domiciled in Australia, with international suppliers located in the United States, China, India, New Zealand, Singapore and Europe. International suppliers are used for the procurement of some electronic screens, electronic components, printing materials, bikes and software.

RISK ANALYSIS



JCDecaux has reviewed and assessed the risk of potential modern slavery practices in both its business operations and supply chains.

BUSINESS OPERATIONS

JCDecaux assesses the risk of modern slavery practices in its direct business operations as low. Firstly, with respect to the entities covered by this report, JCDecaux only conducts business in Australia and New Zealand, countries which are considered comparatively low risk for incidences of modern slavery practices¹. Secondly, Advertising and Media are not industries generally recognised as high risk for modern slavery².

JCDecaux's operations are carried out by skilled, professional employees who are required to have high levels of education, training and accreditation. The complex and skilled nature of JCDecaux's business means modern slavery risks to its employees are extremely low. JCDecaux complies with all relevant employment and industrial relations laws in Australia and New Zealand, and has highly developed human resources processes in place to facilitate this.

SUPPLY CHAINS: AUSTRALIA & NEW ZEALAND

CONSTRUCTION, MAINTENANCE AND POSTING OF ADVERTISING

JCDecaux outsources certain parts of the operational side of its business in Australia and New Zealand, including construction and maintenance

of advertising assets and street furniture, and posting and removal of physical (non-digital) advertising. These services are provided by suppliers who range from highly skilled professionals (e.g. engineers) to construction and maintenance companies engaging skilled workers. In light of the geographic factor referred to above, JCDecaux believes that any risk of modern slavery practices occurring in these direct service providers is low.

CLEANING

In addition, JCDecaux engages cleaning services in respect of the offices and warehouses it maintains. We note that the cleaning industry is regarded as a potential risk industry for modern slavery³. Given the strength of industrial laws and regulation generally in Australia and New Zealand, JCDecaux regards the risk in this area as low.

WORK CLOTHES

We note that clothing manufacture is regarded as an at risk industry for modern slavery⁴. JCDecaux has a limited number of field staff required to wear work clothing which identifies them as JCDecaux employees. These uniforms are sourced by JCDecaux.

1. The Global Slavery Index 2018 ('GSI'): <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>
2. GSI page iv; <https://www.globallslaveryindex.org/2018/findings/importing-risk/g20-countries/>; Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities, Dept of Home Affairs ('Guidance') page 44.
3. Guidance page 44.
4. Refer footnote 2 above.



SUPPLY CHAINS: INTERNATIONAL

In addition to service providers who directly support our business in Australia and New Zealand, JCDecaux sources certain products from outside those two countries. We have assessed that, given the nature of the industry concerned, and the countries of origin, certain products may pose some risk of modern slavery occurring in their manufacturing supply chains.

This stems from the risk that either local laws do not provide a similar level of protection for workers as in Australia and New Zealand, or suppliers do not comply with local laws or respect human rights appropriately in their direct employment and contracting arrangements or activities. It is also possible that components sourced by suppliers from third parties for manufacturing of products may involve modern slavery practices, or in the production of raw materials used to make those components.

DIGITAL SCREENS, COMPONENTS FOR SCREENS AND RELATED ADVERTISING ASSETS

The manufacture of electronic products is considered an at risk sector⁵. These products are sourced from countries in Europe, from the United States and from China. These countries represent a low to moderate geographic risk of modern slavery⁶.

SUBSTRATES, PRINT MACHINERY AND PRINTING SUPPLIES

Through the GSP Print arm of the business printing equipment and stock are sourced from countries including Singapore, China and India. These countries represent a low to moderate geographic risk of modern slavery⁷.

LAPTOPS AND RELATED INFORMATION TECHNOLOGY EQUIPMENT

With over 450 employees across Australia and New Zealand, personal technology and communications equipment are sourced for employee use. As noted above, these products represent a sector which is prone to modern slavery risks⁸.

5. Refer footnote 2 above.

6. Refer Footnote 1 above; refer also GSI Part 05, page 60 ff.

7. Refer Footnote 1 above; refer also GSI Part 05, page 60 ff.

8. Refer footnote 2 above.

ADDRESSING MODERN SLAVERY RISKS



JCDecaux is committed to fostering a high level of integrity and it has the advantage of being part of an international corporate group, with significant resources and experience developed over time at the international level.

Responsible growth and sustainable development are some of the Group's core values⁹, which drives quality and risk management in our operations and supply chain. Fundamental to that objective are the Group's three core Charters¹⁰ :

- The JCDecaux Group Code of Ethics
- The JCDecaux International Charter of Fundamental Social Values
- The JCDecaux Code of Conduct of Suppliers

The Charters enshrine JCDecaux's corporate principles on ethical and social responsibility, as well as supplier conduct and expectations. They apply to all subsidiaries, including the Australia and New Zealand business. The Charters include matters of social and corporate responsibility which cover the risks posed by modern slavery.

The specific application of the Charters to JCDecaux's supply chain is detailed below, however it is relevant to note that all employees of

JCDecaux are required, on commencing employment, to agree to the Group Code of Ethics, with respect to their conduct as employees of the Group. Amongst other things, the Code of Ethics sets out expectations as to how employees should engage with suppliers, including acting at all times with integrity and implementing the Group Supplier Code of Conduct.

Being headquartered in France, JCDecaux's French parent company, JCDecaux SA, is subject to the French anti-corruption and anti-bribery laws known as "SAPIN II". We have implemented compliance with these laws locally, including by introducing compliant Australian and New Zealand whistleblowing policies. We believe that a strong whistleblowing process supports modern slavery mitigation, as it provides a safe pathway for reporting non-compliance within the business, including in areas of modern slavery.

9. <https://www.jcdecaux.com/sustainable-development/our-strategy>

10. <https://www.jcdecaux.com/sustainable-development/social-priorities>

MITIGATION ACTIONS

In 2020, as a first step, JCDecaux formed a local Modern Slavery Committee comprised of members from different parts of the organisation including Legal, Finance, Operations and Government Relations, to address our modern slavery obligations. The committee initially met monthly. It now meets quarterly or as required.

As set out on pages 5 and 6, we have identified that our supply chain, and in particular certain procurement requirements and sources, pose a risk from a modern slavery perspective. One of our primary focusses therefore is to work with suppliers to mitigate risk, including modern slavery risk. This occurs at various levels.

CODE OF CONDUCT, SCREENING, AND FOCUS ON SUPPLIER ACTIONS

At the international level, JCDecaux SA has a global Purchasing Policy which is based on responsible and sustainable purchasing practices. JCDecaux in Australia and New Zealand has implemented this at the local level. One of the key requirements for new suppliers is that they are provided with, and agree to conduct themselves in accordance with, the principles in JCDecaux's Supplier Code of Conduct.

The Code of Conduct addresses modern slavery risks in relation to suppliers' employment and labour practices. It mandates compliance with the International Labour Organization's eight Fundamental Conventions, including in particular:

- Prohibition of forced labour (ILO Conventions No. 29 and No. 105)
- Prohibition of child labour (ILO Convention No. 138)
- Working hours (ILO Convention No. 30)

The Supplier Code of Conduct also addresses suppliers' practices in relation to ethical behaviour, work health and safety, and environmental compliance. JCDecaux's assessment process for new suppliers involves due diligence on the supplier's practices in these areas, and also on a range of legal compliance and quality factors.

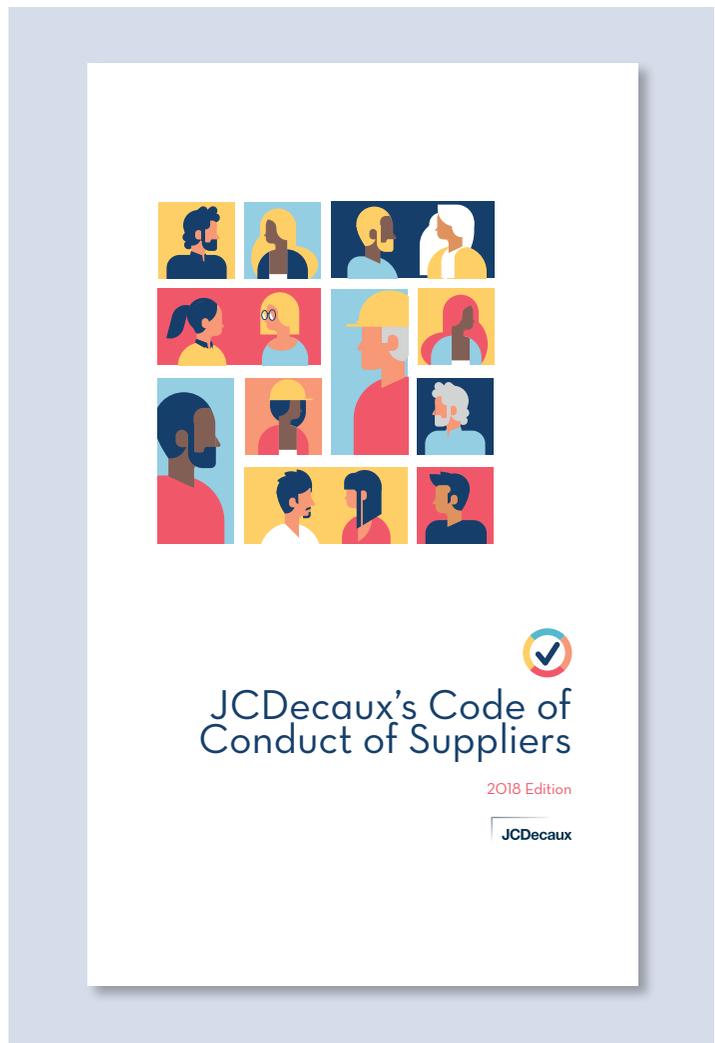
In 2020, JCDecaux updated its Approved Operational Supplier Questionnaire to include questions specifically addressing a supplier's awareness of modern slavery practices, as well as seeking information on the supplier's position on modern slavery, and any mitigation actions which they have put in place.

In particular, JCDecaux has put focus on "Key Suppliers" which include suppliers identified in the modern slavery risk assessment on pages 5 and 6. A "Key Supplier" for JCDecaux is not defined solely by reference to annual spend or business criticality, but includes supplier sectors presenting social or environmental risks, including printers, providers of work clothes, providers of composite material, and providers of digital screen technology for furniture. For example, in 2020 we asked all suppliers of cleaning services to formally acknowledge and comply with the Supplier Code of Conduct, irrespective of the size of the supplier or value of the supply provided.

By assessing suppliers against a broad range of criteria, of which price is only one factor, JCDecaux is seeking to maximise the engagement of quality suppliers who are committed to appropriate standards of commercial behaviour, commensurate with our own expectations. This in turn minimises the risk of unlawful or unethical behaviours, including in relation to modern slavery practices.

In some cases, suppliers have their own Code of Ethics or Code of Conduct, encompassing values aligned to JCDecaux's Charters. In that event, JCDecaux may conduct an assessment of the Supplier's Code, comparing it against the requirements of JCDecaux's Supplier Code of Conduct. This is done using a pre-determined assessment matrix, with Suppliers' codes requiring 90% compliance with JCDecaux's Code of Conduct in order to be acceptable.

During 2020, JCDecaux also commenced a process to review and standardise legal agreements for suppliers across various areas of the business. That process will continue into 2021. As part of those agreements, and in addition to the Suppliers' acceptance of the Code of Conduct, we may seek formal acknowledgements from suppliers, including regarding the importance of mitigating modern slavery risks, and, if appropriate, seeking commitments that suppliers will undertake actions in their own operations to address modern slavery issues.



ASSESSING EFFECTIVENESS

JCDecaux actively monitors and reviews the effectiveness of its actions, primarily through the Modern Slavery Committee.

ONGOING ASSESSMENT OF SUPPLIERS

JCDecaux undertakes a range of ongoing monitoring and reassessment of our suppliers, including their compliance in relation to modern slavery risks. JCDecaux focuses on Key Suppliers who pose the greatest risk from both a business continuity and modern slavery perspective, predominantly suppliers of screens, components for screens, and other advertising assets including street furniture. From an ethical and social perspective, we also concentrate on manufacturers from higher risk geographical territories.

In 2020, we commenced a review of our supplier governance framework generally. In 2021 we will implement changes to that governance framework to simplify the risk categorisation of suppliers.

The risk category of particular suppliers will determine the frequency and extent of periodical reassessment of suppliers, with high risk suppliers warranting more scrutiny in the reassessment process. Reassessment actions may include desktop audits, updated supplier questionnaires, risk reviews, contract reviews and/or on-site audits, as appropriate. Modern slavery risks and practices of suppliers will form part of this updated governance process.

JCDecaux conducts visits and inspections to manufacturing facilities of suppliers located overseas. Inspections were not able to be conducted in 2020 due to restrictions on international travel due to COVID-19.

JCDecaux also conducts ongoing training of key procurement staff to reinforce knowledge of appropriate purchasing behaviours and standards. Reinforcing an understanding of, and commitment to, the JCDecaux Charters in 2021 is a priority for the JCDecaux business globally.

INTERNAL AUDIT

The JCDecaux headquarters in France regularly conducts internal audits of its subsidiaries' business activities. JCDecaux Australia and New Zealand was subject to a business-wide internal audit in October 2019, and a further Sustainability Audit in November 2020. Both audits included as key focuses our compliance with targets for implementing the Supplier Code of Conduct.

CONSULTATION

As described above in this Statement (refer page 3), the entities in the Group operate as a wholistic business. Consultation with all areas of the business was achieved primarily via the Modern Slavery Committee (described on page 8), which included senior managers representing all relevant parts of the Group business, including Procurement, Operations, Legal, Finance and Government Relations. Careful consideration was given to the make-up of the Committee, with a focus on those areas considered most relevant to modern slavery risks, including those responsible for procurement and supply chains. The committee met regularly throughout the reporting period in order to fully assess modern slavery risks, and allow time for business areas to investigate and report back to the Committee on current practices, and consider mitigation actions.

APPROVAL

This statement is submitted by JCDecaux Australia Holdings Pty Limited on its own behalf, and on behalf of all companies in the JCDecaux Australia & New Zealand Group, including the Reporting Entities set out on page 3. This statement was approved by the board of JCDecaux Australia Holdings Pty Limited as holding company on 7 May 2021.



Stephen O'Connor
Director and Chief Executive Officer