

JCDecaux

**MODERN**  
SLAVERY  
STATEMENT 2022



BUS

Saint-Sulpice

84

PARIS

Station d'Essai  
Station de Métro  
Station de Vélo

PARIS

Station d'Essai  
Station de Métro  
Station de Vélo

84

JCDbeaux

ROUGE DIOR  
NOUVEAU FOREVER LIQUID  
ET ROUGE FINI VELOURS

DIOR

STATION  
D'ESSAI  
LIQUIDE





# 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 81 countries. JCDecaux reaches over 850 million people worldwide every day, across more than 1 million advertising panels.

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.

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.









# STRUCTURE & 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 SE 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 and public payphones. JCDecaux also supplies and operates large format advertising panels, as well as bus advertising. We operate over 40,000 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 just under 500 staff members.

\*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.





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 primarily 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 9 to 17 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 responsible, working with our partners, clients and communities to enhance environments and the cities in which we operate.



# SUPPLY CHAIN

JCDecaux has re-assessed its supply chains relevant to the 2022 calendar year. Our supply chains have not changed materially from the previous year.

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 such as bus shelters, automatic public toilets, bins, benches, and public phonebooths. Specific to advertising assets and panels, we engage service suppliers including engineering consultants, asset installers, civil and electrical contractors, 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 including shipping, consultancy (marketing, legal and external consultancy), photography, office cleaners, fleet management services, waste management services 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, 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 practices.<sup>1</sup> Secondly, Advertising and Media are not industries generally recognised as high risk for modern slavery.<sup>2</sup>

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.

This includes verifying all new employees' right to work in Australia or New Zealand, as applicable. Where an individual's right to work is based on a visa, JCDecaux periodically tracks and verifies the visa status using a third party provider to ensure that their employment conditions aligns with their visa conditions.

## 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 slavery.<sup>3</sup> 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 slavery.<sup>4</sup> JCDecaux has a limited number of field staff required to wear work clothing which identifies them as JCDecaux employees. These uniforms are sourced by procurement within JCDecaux through Australian suppliers.

## **WASTE MANAGEMENT SERVICES**

The waste industry is regarded as an at-risk industry for modern slavery. JCDecaux does not have any staff directly delivering such services across Australia or New Zealand. JCDecaux engages the services of third-party waste management services suppliers to address its general waste and recycling needs. These suppliers are evaluated yearly to assess their compliance to our Supplier Code of Conduct and the risk of modern slavery is deemed to be low.

## **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 sector.<sup>5</sup> 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 slavery.<sup>6</sup>

## **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 slavery.<sup>7</sup>

## **LAPTOPS AND RELATED INFORMATION TECHNOLOGY EQUIPMENT**

With just under 500 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 risks.<sup>8</sup>

1. The Global Slavery Index 2018 ('GSI'): <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>
2. GSI page iv.; <https://www.walkfree.org/global-slavery-index/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.
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.



Exit 3 York St Exit 3

The advertisement features two men standing in front of a brick wall with greenery. The man on the left is wearing a dark suit and a red tie, while the man on the right is wearing a light-colored button-down shirt and a red baseball cap. The text on the screen reads:

**Business experts in more than money**

**NAB Business Experts**

**JCDecaux**

The NAB logo is visible in the top right corner of the advertisement.

Caution!

Caution!



# 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 values.<sup>9</sup> Which drives quality and risk management in our operations and supply chain. Fundamental to that objective are the Group's three core Charters<sup>10</sup> :

- 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.

In 2022 the JCDecaux Group released an updated Supplier Code of Conduct following a review of the Code of Conduct in 2021.

Being headquartered in France, JCDecaux's French parent company, JCDecaux SE, 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. JCDcaux conducted a review of its whistleblowing policies in Australia and New Zealand, which were updated in August 2022. 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.

#### **MITIGATION ACTIONS**

JCDcaux maintains a Procurement Committee comprised of members from different parts of the organisation including Procurement, Legal, Finance, and Operations. The Committee's remit covers all aspects of procurement for the Australia and New Zealand business, including matters relating to Modern Slavery.

As set out on pages 9 and 10, 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, JCDcaux SE has a global Purchasing Policy which is based on responsible and sustainable purchasing practices. JCDcaux 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 JCDcaux'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 particular, JCDecaux has put focus on "Key Suppliers" which include suppliers identified in the modern slavery risk assessment on pages 9 and 10. 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 street furniture. For example, we ask 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.

Over the past two years, JCDecaux has implemented changes to the process to evaluate key suppliers such as digital screen manufacturers, electronic components suppliers, installation contractors and poster printing material suppliers. The suppliers are categorised according to a strict evaluation process which takes into account the supplier's nature of business, the supplier's performance during previous evaluations and volume of business with JCDecaux.

The supplier classification assesses the degree of risk from supplier's performance. The factors include their past performance in Quality, Environment, Health and Safety, their annual spend with JCDecaux in the past 3 years, their geographical location and social responsibility.

In the new evaluation system, a risk assessment questionnaire has been developed based on certain criteria. The questionnaire includes 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.

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.

In 2022, JCDecaux has continued the implementation of standardised legal agreements for key suppliers across various areas of the business.

9. <https://www.jcdecaux.com/sustainable-development/our-strategy>
10. <https://www.jcdecaux.com/sustainable-development/social-priorities>. <https://www.jcdecaux.com/our-ethic#supplier-code-conduct>





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# ASSESSING EFFECTIVENESS

JCDecaux actively monitors and reviews the effectiveness of its actions, primarily through the Procurement 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 2022, 100% of our Key Suppliers were assessed.

In 2021 JCDecaux conducted a comprehensive review of its supplier governance framework. This included the revised risk assessment referred to on page 14 of this Statement. The risk category in which a supplier is assessed determines the extent of periodical reassessment of suppliers, with high risk

suppliers warranting more scrutiny in the reassessment process.

All suppliers are audited at least every two years, however to mitigate the risk, high risk suppliers are audited more frequently. This may include onsite audits where that is reasonably practicable. In addition, supplier contracts are reviewed at least every 4 years to ensure consistency with the risk category evaluation.

In 2022:

- 100% of our key suppliers signed our Code of Conduct
- 100% of our direct key suppliers were audited, using JCDecaux's audit process and questionnaire

JCDecaux is planning to conduct visits and inspections to manufacturing facilities of suppliers located overseas, after being put on hold because of 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. 100% of JCDecaux's key procurement staff completed this training in 2022. Reinforcing an understanding of, and commitment to, the JCDecaux Charters has been a priority for the JCDecaux business globally in 2022.

## **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. The next internal audit for JCDecaux Australia and New Zealand is scheduled for October 2023.



## **CONSULTATION**

As described above in this Statement (refer page 5), the entities in the Group operate as a wholistic business. Consultation with all areas of the business was achieved primarily via the Procurement Committee (described on page 13), 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 quarterly 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 5. This statement was approved by the board of JCDecaux Australia Holdings Pty Limited as holding company on 26 June 2023.

A handwritten signature in black ink, appearing to read "Stephen O'Connor".

Stephen O'Connor  
Director and Chief Executive  
Officer





EMERALD SUN HWT  
GREAT WESTERN

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EMERALD SUN  
GREAT WESTERN

Flinders Street Station

on Swanston Street

Stop 13

Routes 1 3/3

JCDecaux  
DIOR  
LA HAUTE COUTURE COLLECTION

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