



**QMS Media Pty Limited**

**MODERN SLAVERY STATEMENT**

**2022**

# QMS Media Pty Limited

## Modern Slavery Statement 2022

### INTRODUCTION

This statement has been developed in accordance with the Australian Modern Slavery Act 2018 (Cth) (**the Act**) and is issued on behalf of QMS Media Pty Limited (ACN 603 037 341) and its related body corporates listed in Schedule 1 (referred collectively as the **QMS Media Group**). This statement outlines the steps taken by the QMS Media Group to identify, assess and reduce the risk of modern slavery practices within its operations or its supply chains during the reporting year ending 31 December 2022, and builds on the QMS Media Group's previous statements.

The QMS Media Group remains committed to conducting its business in a moral and ethical way, recognising the need to establish and maintain corporate governance policies and business practices which reflect and comply with relevant legal and regulatory framework. In support of this commitment QMS Media continues to build on its approach and previous work undertaken to address modern slavery risks, including implementing and enforcing effective systems and controls.

### STRUCTURE AND OPERATIONS

#### Structure

QMS Media is a large proprietary company incorporated in Australia with its registered office in Melbourne, Victoria which operates across Australia with primary operations in Melbourne, Sydney, Brisbane, The Gold Coast and Perth. As at 31 December 2022, the QMS Media Group employed approximately 248 employees.

Other QMS Media investments included a 40% interest in Mediaworks Investments Limited, New Zealand.

#### Direct operations

The QMS Media Group are leaders in premium outdoor advertising, with a strategic focus in providing clients and agencies with dynamic and innovative advertising solutions, underpinned by the latest developments in technology and data. The QMS Media Group provides multi-platform engagement across its portfolio of premium landmark digital and traditional static billboards, exclusive street furniture and airport opportunities across Australia. The QMS Media Group also includes print production operations across Australia.

#### Supply chains

The QMS Media Group has reviewed its supply chains for the reporting period and its supply chains have not materially changed from the previous reporting period.

The QMS Media Groups largest categories of supplier spending relate to the following key product and services categories:

1. goods and services (including digital LED screens) needed to construct, install, operate and maintain its out of home advertising and non advertising infrastructure. The QMS Media Group acquires LED screens and components from local and international suppliers to construct and maintain its digital advertising infrastructure. Services specific to construction and maintenance include engineering consultants, town planners and cleaners.

2. goods and services needed to produce and deliver advertising material including paper, ink, printing services, equipment;
3. services needed for everyday business operations, including recruitment, legal and tax, auditing, information technology, telecommunications and cleaning; and
4. software licences.

The majority of the QMS Media Group's suppliers are located in Australia however for the procurement of some products and services, namely digital display units and components and bus shelters, are sourced from international suppliers who have operations in the higher risk locations of Hong Kong and China.

## **RISKS OF MODERN SLAVERY PRACTICES**

### **Direct operations**

QMS Media has assessed the risk of modern slavery practices within the QMS Media Group's direct business operations as low. The QMS Media Group operates its business and has offices and warehouses in Australia and New Zealand, both which are considered low risk for instances of modern slavery practices. The out of home advertising industry is not an industry generally considered as high risk for modern slavery.

QMS Media has appropriate workplace management policies and practices, along with skilled managers and executives, to ensure appropriate recruitment and management of employees is maintained, including compliance with minimum remuneration requirements.

### **Supply chains**

QMS Media Group continues to review the risk of modern slavery practices across its supply chains with close consideration of the *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities* document<sup>1</sup>.

The QMS Media Group outsources some parts of its business operations, such as designing and constructing advertising assets and street furniture and posting and removing advertising material to external service providers in Australia and New Zealand. The QMS Media Group assesses the risk of modern slavery practices occurring in these service providers to be minimal.

The QMS Media Group also engages cleaning services for its offices and warehouses and its street furniture located at 7-Eleven premises in Australia. While the QMS Media Group acknowledges that the cleaning industry is regarded as high risk industry for modern slavery, the QMS Media Group assesses the risk in this area as low due to Australia's industrial laws and regulations.

The QMS Media Group purchases laptops, computers and mobile phones via domestic suppliers who in some cases may import from overseas. These products represent a sector which is prone to modern slavery.

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<sup>1</sup> <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

While most of the QMS Media Group's direct supply chain expenditure is located in Australia, some goods and sources are sourced from global suppliers. The QMS Media Group generally deals with Australian based subsidiaries of these international suppliers and acknowledges that these suppliers may have a wider supply chain involving other jurisdictions which QMS Media does not have oversight. In these instances, QMS Media acknowledges suppliers engaged in Australia could purchase equipment manufactured overseas in areas that might be of risk of modern slavery practices. However, this is mitigated by the QMS Media Group's major supplier agreements containing obligations of compliance with modern slavery laws and engaging reputable global suppliers that are based in countries where there are reasonable standards of protection for individual rights and there is not significant workforce of vulnerable populations.

Further, the QMS Media Group requires its suppliers to adhere to its Ethical Sourcing Code of Conduct to conform to its standards and provisions and to apply the Ethical Sourcing Code of Conduct to their own suppliers engaged in the production of goods for the QMS Media Group. A supplier's use of slave labour or engagement in human trafficking will be considered a material violation of the QMS Media Group Ethical Sourcing Code of Conduct which would result in termination. A supplier's failure to comply with other elements of the QMS Media Group Ethical Sourcing Code of Conduct will result in appropriate disciplinary action which may include, without limitation, a discontinuity of our relationship.

As the QMS Media Group business continues to expand, we are mindful of the increased risks relating to modern slavery associated particularly in the QMS Media Group's extended supply chain and higher risk categories or locations.

## **ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

QMS Media remains committed to identifying and addressing modern slavery in its operations and supply chains. This is reflected in a number of policies, processes and practices implemented, and to be implemented, across the QMS Media Group.

### **Goods and services suppliers**

The QMS Media Group seeks to obtain goods and services from suppliers known to be reputable, substantial commercial entities. In many instances QMS Media has dealt with those suppliers over many years, which provides QMS Media with a high level of confidence in the quality of their services and operations.

### **QMS Media Group personnel**

The QMS Media Group has people and culture, finance, legal, procurement and internal audit teams whose roles include ensuring compliance with laws and internal policies and processes across the businesses.

### **QMS Media Code of Business Conduct and other policies**

- The QMS Media Code of Business Conduct applies to all QMS Media Group personnel, including employees, contractors, managers and directors.
- The Code of Business Conduct outlines standards, practices and behaviors necessary to maintain confidence in the integrity of the QMS Media Group and makes clear the behaviours expected of all QMS Media Group personnel to strengthen the internal culture of the business. This includes behaving ethically and complying with the law.

- The QMS Media Group has other policies and codes to help guide the behaviours of its personnel, including a Diversity Policy and Ethical Sourcing Code of Conduct. All policies and codes are available to employees on the QMS Media intranet and all policies relevant to external parties available on the QMS Media website.

### **Recruitment**

- The majority of recruitment for the QMS Media Group is conducted by personnel located in Melbourne, Australia. QMS Media is therefore able to ensure that the process is conducted in an ethical and transparent manner and employment contracts contain fair and just terms in relation to wages, working hours and other working conditions.
- This recruitment oversight aids in curbing any direct instances of modern slavery practices within the QMS Media Group's operations.
- All new employees are given a copy of relevant QMS Media's policies as part of their induction. QMS Media requires all new employees to acknowledge they have received and agree to abide by the relevant QMS Media policies.

### **ISO certification**

QMS Media maintains a Workplace Health and Safety Management System and the following certifications:

- ISO 9001:2015 Quality management systems;
- ISO 45001: 2018 Occupational health and safety management system
- ISO 15001:2015 Environmental Management System

### **Material agreement sign off**

The QMS Media Group requires any material agreement to be signed off from senior management of QMS Media. This approval includes consideration of risks relating to entering into an agreement with a supplier, which could include the identity, location or operations of the counterparty.

## **ASSESSMENT OF EFFECTIVENESS**

QMS Media understands that modern slavery risk is continually evolving and remains committed to staying vigilant to slavery and human trafficking in its supply chains. As part of QMS Media's continuing commitment to identify and eradicate modern slavery practices in its operations and supply chains the following additional actions have either commenced or are planned and will be reported on in subsequent statements.

### **New supplier assurance questionnaires – City of Sydney project**

QMS Media has two supplier assurance questionnaires (**Assurance Questionnaires**) that may be given to new suppliers for the City of Sydney project based on the supplier risk profile categoriation. The Assurance Questionnaires are given to new suppliers to the City of Sydney project to complete and assist the QMS Media Group to identify and assess the risk of modern slavery practices occurring in its supply chains.

A new supplier categorisation matrix is used to extend the QMS Media Group's risk profiling by categorising a new supplier's risk levels based on territory, product type or service.

The determined profile will dictate which Assurance Questionnaire is to be provided to the new supplier for completion and what supporting documentation is required.

## **Modern slavery supplier questionnaire**

QMS Media is not practically able to observe the entirety of suppliers' operations. As part of our supply chain due diligence, during 2022 QMS Media undertook preparatory work to develop a modern slavery supplier questionnaire (**Modern Slavery Questionnaire**) to be distributed all existing and new major suppliers (and others we consider operate in high risk areas) to gather information about our suppliers' operations, supply chains and modern slavery standards. QMS Media may take additional steps based on a supplier's response to our Modern Slavery Questionnaire or an assessment of the products and services provided by a supplier. QMS Media is committed to responding accurately and promptly to modern slavery questionnaires or questions received from clients.

## **Modern Slavery Policy**

A Modern Slavery Policy has been implemented across the QMS Media Group. The policy solidifies the QMS Media Group's commitment to identifying and addressing risks of modern slavery occurring in its supply chains and set out the standards of behavior expected of the QMS Media Group personnel in identifying and addressing modern slavery risks.

## **Code of Business Conduct and other policies**

QMS Media's employee Code of Business Conduct ensures that staff practice ethical business standards and take steps such as conducting due diligence checks with respect to prospective suppliers and report any unlawful practices such as forced labour or slavery/slavery like practices observed in QMS Media's supply chains.

QMS Media will continue to regularly review our Code of Business Conduct and other policies to ensure they remain up to date and effective in assessing modern slavery risks.

## **Integrated Management System**

QMS Media's City of Sydney project has an integrated management system that acts as an efficient mechanism to analyze and monitor suppliers in relation to particular areas of the business.

## **Ethical Sourcing Code of Conduct**

QMS Media has a supplier Ethical Sourcing Code of Conduct (**Supplier Code of Conduct**) which is publically available on the QMS Media website. QMS Media's Supplier Code of Conduct sets out QMS Media's expectations and the minimum standards of behaviour required of our suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts and health and safety. It also specifically addresses labour, human rights and modern slavery standards. In certain supply categories suppliers are required to confirm that they have read Supplier Code of Conduct – Ethical Sourcing and that the content is materially similar to their company's code of conduct.

## **Environmental, Social and Governance (ESG) reporting**

QMS Media uses an ESG reporting templates to report to the QMS Media board on ESG business aspects on a quarterly basis. QMS Media is committed to responding accurately and promptly to ESG questionnaires received from third parties.

## **Employee training and policy compliance**

QMS Media continues to bring awareness to modern slavery risks to all staff specifically involved in managing the supply chain. During 2022 QMS Media undertook preparatory work

to develop an employee periodic acknowledgement of their compliance with with all relevant QMS Media policies.

## **CONSULTATION**


The QMS Media Group operates under broadly common policies and operational protocols having its key activities within the out of home media sector and reporting to to an intergrated leadership team and the QMS Media Board. Suppliers and supply chains are common across the QMS Media Group. As such, it is appropriate to provide a single statement for the QMS Media Group. As the ultimate holding company of the QMS Media Group, QMS Media has the required knowledge of the group's operations to prepare this statement. Staff involved in the preparation of this statement have consulted with the necessary business operations of the QMS Media Group to gather the necessary information to prepare this statement on behalf of the QMS Media Group.

## **COMMITMENT TO CONTINUOUS IMPROVEMENT**

The QMS Media Group recognises that the identification and prevention of modern slavery in its supply chain is a continuing committment. As we continue to uphold our processes and procedures, in future reporting periods we will continue to assess the results and update and expand our measures to ensure the prevention of modern slavery and human trafficking in QMS operations and supply chain.

## **APPROVAL**

This statement was approved by the Board of Directors of QMS Media Pty Limited as the parent company of the QMS Media Group, on 24 May 2023.



John O'Neill CEO

QMS Media Pty Limited

Date: 24 May 2023

## **SCHEDULE 1**

### **AUSTRALIAN COMPANIES**

Australian Billboard Company Pty Ltd

BMG Australasia Pty Ltd

Digital Outdoor Media (Aust) Pty Ltd

Digital Outdoor Media (NSW) Pty Ltd

Digital Outdoor Media (QLD) Pty Ltd

Digital Outdoor Media (VIC) Pty Ltd

Digital Outdoor Media (WA) Pty Ltd

Elwood Outdoor Advertising Pty Ltd

MMTB Pty Ltd

Octopus Property Pty Ltd

Omnigraphics Australia Pty Limited

Paramount Outdoor Pty Ltd

Plexity Holdings Pty Ltd

Q Media Pty Ltd

QMS Australian Holdings Pty Ltd

QMS Australia Pty Ltd

QMS Rail Media Pty Ltd

Riverview Signage Pty Ltd

Riverview Signage Trust

Skyline Digital Pty Ltd

Standout Media Pty Ltd

The Digital Outdoor Group Pty Ltd