



Modern Slavery Statement
for the reporting period 1 Jan - 31 Dec 2021

Introduction

oOh!media Limited (ABN 69 602 195 380) (**OML**) presents this joint Modern Slavery Statement on behalf of itself and each of its Australian subsidiaries as listed in Attachment 1. OML and its Australian subsidiaries are referred to in this Statement as 'the oOh! Group', 'the Group' or 'oOh!'.¹

This Statement is prepared for the reporting period ended 31 December 2021 (**FY21**) and builds on the oOh! Group's first Modern Slavery Statement for the year ended 31 December 2020.

oOh! is a values-based organisation that supports action to combat modern slavery.

oOh! remains committed to enhancing both transparency and modern slavery risk capability in its supply chain management, with actions outlined in this Statement building on foundational work undertaken in past years, with an increasing focus on the most effective actions, based on learnings from implementing its Anti-Modern Slavery (**AMS**) plans from previous years.

Structure & Operations

OML is a public company listed on the Australian Securities Exchange (ASX) and the parent company in the oOh! Group. Its registered office and principal place of business is Level 2, 73 Miller Street, North Sydney NSW 2060.

The oOh! Group, a market leader in the Australian Out of Home media industry, enhances public spaces through the creation of engaging environments that help advertisers, landlords, leaseholders, community organisations, local councils and governments reach large and diverse public audiences.

The oOh! Group together with its New Zealand subsidiaries has an extensive network of more than 37,000 digital and static asset locations which includes roadsides, retail centres, airports, train stations, bus stops, office towers, cafes, bars and universities across Australia and New Zealand.

With offices and warehouses across Australia and New Zealand to service and support its network, the oOh! Group and its New Zealand subsidiaries had consolidated revenues of \$503.7 million in 2021 and \$426.5 million in 2020.

The oOh! Group had 770 Australian-based employees as at 31 December 2021. A further 61 staff are employed by the Group's New Zealand subsidiaries.

During CY21, oOh! sold its digital publishing business. As a result, by year-end, the Group's business operations included the provision of services to customers in:

- media/advertising
- content creation, procurement and supply
- street furniture installation and maintenance and
- large-scale printing.

Operations also include the Group's corporate functions.

¹ The oOh! corporate group includes, in addition to the Australian subsidiaries, 4 wholly owned subsidiaries which carry on business solely in New Zealand, also identified in Attachment 1.

oOh! Group Supply Chains

The oOh! Group procurement relationships are specific to each area of operations.

Key categories of operations and spend are media services, content services, street furniture services, printing and corporate functions (internal).

Some higher risk locations, namely China, Malaysia or India, are amongst oOh! sources for digital display units and spare parts, bus shelters and component parts, substrates for printing and inks, paper, labels and packaging, marketing merchandise or information technology.

As at 31 December 2021 the oOh! Group's direct suppliers¹ were located² across geographic regions as follows:

Location ²	FY21 spend % ³
Asia	0.44
Australia	97.51
Europe	0.01
New Zealand	0.04
North America	2.00

- 1 oOh!'s concession partners, who supply the leased and licensed premises on which oOh!'s signs are placed, are excluded on the basis that supply of Australian real estate does not carry modern slavery risk beyond the utilities that service the real estate, assessed as very low.
- 2 Location is based on records of address of oOh!'s direct supplier, subject to an overlay for where a known source of the direct supplier is in a higher risk country, with the supply then being attributed to the higher risk country. As such it is likely to under-represent original sources of Group supplies, where these are less visible deeper in the Group's supply chains.
3. Some changes from the 2020 Statement reflect 2021 exclusion of New Zealand subsidiaries' suppliers and concession partners.

As this table indicates, the overwhelming majority of the oOh! Group's direct supplier relationships are with suppliers based in locations that have higher awareness and relatively lower risks of modern slavery, namely Australia, New Zealand and North America.

Work to date in respect of oOh!'s supply chains has focussed on the risks inherent in suppliers (either first tier or known second or subsequent tier) known to be located in higher risk locations and/or those providing higher risk products or services.

Modern Slavery Risks

As reported in respect of the 2020 reporting period, the inventory of the Out of Home media industry is unique in nature, being licences and leases over Australian and New Zealand real estate on which signage is installed. As such, it represents a low inherent risk of modern slavery.

Other oOh! supply chains with lower risks of modern slavery exist where major suppliers to the Group are based in Australia or New Zealand and operate in highly regulated industries, such as banking & insurance, professional services and data services.

On the basis of prior year work, oOh! identified the goods and services in its supply chains of highest risk of modern slavery to be those listed below, particularly where sourced from countries with higher risk of modern slavery:

Higher Risk Products
<ul style="list-style-type: none">• digital display units• bus shelters and component parts• substrates/canvasses• printing inks• marketing merchandise

Higher Risk Services
<ul style="list-style-type: none">• information technology• shipping

Although kept under review, this position remained unchanged in CY21.

Assessing and addressing modern slavery risks

Status at start of reporting period

Based on prior year work, oOh! had, by the start of CY21, undertaken the actions noted below and described in its Modern Slavery Statement for CY20:

Actions previously taken to investigate and assess risks of modern slavery	Actions previously taken to address risks of modern slavery
Specialised procurement function established	Code of Conduct confirms commitment to address modern slavery
New vendor onboarding process introduced	Modern Slavery awareness raising training of Executive
Review of supply chains & Destop review of supplier data undertaken	New anti-modern slavery contract provisions introduced
Vendor due diligence questionnaire initiated	Anti-modern slavery practice note developed
Factory site visits (prior to COVID)	

Overview of actions taken in CY21

Building on the foundational work previously reported, oOh! undertook the following further actions in CY21 to investigate and assess and to address risks of modern slavery in its supply chains:

Additional actions taken CY21 to investigate and assess risks of modern slavery	Additional actions taken CY21 to address risks of modern slavery
Expansion and embedding of vendor onboarding process	Revised supplier contract terms
Focused Vendor due diligence	Anti-modern slavery practice note rollout ¹
Standardised approach to modern slavery risk-assessment ¹	
Centralised record keeping	

¹ As oOh!'s standardised approach to supplier modern slavery risk-assessment is set under its AMS Practice Note, these items are addressed together below.

Expansion and embedding of vendor onboarding process

The new vendor form (**NVF**) was introduced in CY20 for use in due diligence of new suppliers paid via the Group's principal accounting system and of existing vendors when they change their details in that system.

NVF use was expanded during CY21, being also required for accounts in the Group's supplementary vendor accounting system used for the New Zealand business, with planned further expansion to the content business from CY22.

The NVF was introduced in CY20 under a standard procedure and supported by guidance notes. It requires specific information about whether the supplier provides products or services with high inherent MS risk and more generally concerning any reason to suspect MS risk.

In CY21 usage of the NVF has become embedded in the Group's principal accounts payable system, with the Group's Accounts Payable team monitoring both completion of NVFs and content of completed NVFs and engaging with staff to facilitate better understanding and accurate completion of NVFs. The form itself and the guidance provided with it have been fine-tuned to incorporate learnings from the early months of its use.

Initial AMS risk assessment is undertaken based on the responses in completed NVFs. For those suppliers who are flagged as other than low risk, further AMS risk assessment/risk response is undertaken.

Focussed vendor due diligence

The due diligence questionnaire developed and used in CY20 was reviewed in light of the lived experience with it and the updated questionnaire deployed for CY21 due diligence.

This questionnaire is used in two situations:

- **For new suppliers (or those with changed details):** Where, based on the responses in a completed NVF, initial modern slavery (**MS**) risk assessment suggests an inherent MS risk is other than low risk, this is followed up with a due diligence questionnaire.
- **For existing suppliers:** Due diligence questionnaires are issued pro-actively to a targeted group for maximum effectiveness:
 - the Group's top 30 providers of the high-risk products identified on page 3; and
 - the Group's top 10 providers of the high-risk services identified on page 3, after excluding those in each category who lodge MS Statements, as it is more efficient to obtain required information from their MS Statements.

Information from supplier responses to the due diligence questionnaires or supplier MS Statements is then used to re-assess the supplier against the Group's MS risk flowchart (see below under 'Standardised approach to modern slavery risk-assessment'). To date this has resulted in a reduction of the MS risk assessment (from initial assessment) in most re-assessments and no increase in any.

Work testing responses and pursuing further tranches of suppliers for due diligence questionnaires is ongoing.

Centralised records

Actions taken during CY 2021 have resulted in the establishment of centralised records in respect of the Group's AMS activities, being:

- where NVFs are completed, they are retained in the Group's Customer Relationship Management system
- due diligence questionnaires and responses are maintained with a governance database
- for suppliers where due diligence questionnaires are considered necessary, a heatmap of initial and subsequent MS risk is maintained, noting the basis for any movement in assessment.

Anti Modern Slavery Practice Note and Standardised approach to modern slavery risk-assessment

Practice Notes constitute part of the Group's mandatory processes under its governance framework.

In CY20 work on a Group AMS Practice Note was deferred pending the rollout of the NVF Practice Note. During CY21 the AMS Practice Note was finalised and implemented.

The AMS Practice Note introduces a flowchart for modern slavery risk assessment, for systematic and standardised assessment across the Group. It also mandates escalated responses based on modern slavery risk of suppliers, including the form of MS contract provisions required in respect of each risk level.

Revised supplier contract terms

Modern slavery-specific template provisions developed in CY20 for inclusion in supplier agreements were refined in CY21 in light of the lived experience of contract negotiations, with different templates available to different contexts.

These provisions continue to be incorporated supplier terms as new arrangements are entered into and existing arrangements renewed, based on MS risk of the supplier.

Assessing the effectiveness of the actions taken

Review of effectiveness

Adopting a 'continuous learnings' approach, over the course of CY21 the Group's AMS working group assessed the effectiveness of the actions being taken. Subsequent decisions have and will continue to reflect that assessment. In particular:

- to focus working group resources more effectively on upstream review rather than responding to downstream inquiry, oOh! has developed a modern slavery due diligence 'super-response'. This is designed to address in substance, all questions raised in any due diligence forms received to date, so can be issued in response to all.
- oOh! Group has relied on alternatives to multi-tier supplier mapping, including qualitative due diligence responses and, in CY22, is exploring other options including reliable third party certifications.

Anti-modern slavery oversight

Modern Slavery is included in the Annual Workplan of the Board Audit Risk and Compliance Committee (**ARCC**) and forms part of the oOh! Group governance and risk frameworks.

Annual reviews of oOh!'s governance and risk frameworks and at least bi-annual reviews of all policies and procedures are an inherent part of oOh!'s governance and risk frameworks and will be undertaken also in respect of modern slavery risks and responses.

During CY21 preparatory work was undertaken to introduce quarterly exception reporting to senior management and ARCC in respect of identified vendor AMS risk. This is to inform senior-level assessment of MS risks and trends and facilitate also leaders' ability to assess the effectiveness of AMS actions.

Consultation with Group subsidiaries

The oOh! Group approaches regulatory compliance and risk management on a Group-wide basis, including in respect of modern slavery. As a result all Group policies and procedures apply across the oOh! Group, with occasional variation as required by operational matters such as legacy systems.

During FY21 the Group's Modern Slavery working party included the Group CFO, who is an executive director of each of the oOh! Group subsidiaries, the Group General Counsel and other specialists with Group-wide responsibilities, such as procurement.

In addition, the work on the implementation of the NVF, referenced above, involved significant outreach by members of the working party to engage with those parts of the Group for which procurement is a significant responsibility. This consultation remains a key component of both the supply chain review and the consequent assessment of modern slavery risk within supply chains.

Commitment to continuous improvement

The oOh! Group recognises that preventing modern slavery requires a continuing year-on-year commitment.

The Group is committed to continuously improving modern slavery risk identification and mitigation in its supply chains and remediation in any instances where modern slavery may be identified.

oOh! will continue to track and publicly report on progress through its annual Modern Slavery Statements.

Board Approval

This Statement has been approved by the Board of Directors of oOh!media Limited and is signed on its behalf and on behalf of the oOh! Group by



Tony Faure
Chair



Cathy O'Connor
Managing Director

June 2022

Attachment 1

OML's Australian Subsidiaries

(together with OML, these Australian Subsidiaries constitute "the oOh! Group" for the purposes of this Statement, unless the context indicates otherwise)

Name of entity	ABN
Cactus Holdings Pty Limited	84 129 630 539
Cactus Imaging Pty Limited	37 072 625 720
Closebuys Pty Limited	55 154 140 502
Executive Channel Pty Ltd	78 111 937 234
Executive Channel International Pty Ltd	13 168 374 114
Eye Corp Pty Limited	85 064 564 496
Eye Corp Australia Pty Limited	62 069 009 614
Eye Drive Melbourne Pty Limited	79 006 468 391
Eye Drive Sydney Pty Limited	98 007 305 179
Eye Mall Media Pty Limited	72 076 870 347
Eye Outdoor Pty Limited	37 097 413 351
Eye Shop Pty Limited	30 083 817 912
Faster Louder Pty Ltd	63 108 083 192
Homemaker Media Pty Limited	39 156 361 536
Inlink Café Pty Ltd	44 148 167 604
Inlink Fitness Pty Ltd	85 153 851 542
Inlink Office Pty Ltd	96 100 091 469
InTheMix dot com dot au Pty Ltd	76 114 153 310
oOh!media Assets Pty Limited	63 103 552 414
oOh!media Café Screen Pty Limited	82 155 476 458
oOh!media Digital Pty Limited	66 082 571 462
oOh!media Factor Pty Limited	64 093 932 588
oOh!media Fly Pty Limited	55 094 425 395
oOh!media Group Pty Limited	96 091 780 924
oOh!media Lifestyle Pty Limited	88 105 665 076
oOh!media Locate Pty Ltd	50 113 793 650
oOh!media MEP Pty Limited	103 820 266
oOh!media Office Pty Limited	98 089 615 814
oOh!media Operations Pty Limited	44 094 713 210
oOh!media Produce Pty Limited	57 088 916 616
oOh!media Regional Pty Ltd	80 062 090 653
oOh!media Retail Pty Limited	40 116 539 505
oOh!media Roadside Pty Limited	72 099 303 670
oOh!media Shop Pty Limited	64 107 873 487
oOh!media Street Furniture Pty Ltd	77 000 081 872
oOh!media Study Pty Limited	29 093 233 768
Outdoor Media Operations Pty Limited	154 668 087
Outdoor Plus Pty Limited	003 443 463
Qjump Australia Pty Limited	93 126 597 199
Red Outdoor Pty Ltd	41 129 723 075
Sound Alliance Nominees Pty Ltd	119 522 155
Thought By Them Pty Ltd	22 114 949 405

New Zealand subsidiaries of OML

	NZ company No
oOh!media New Zealand Limited	1553088
oOh!media Retail New Zealand Limited	1105338
oOh!media Street Furniture New Zealand Limited	902243
oOh!media Study New Zealand Limited	1273160