



Modern Slavery Statement
for the reporting period 1 Jan - 31 Dec 2022

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 2022 (**CY22**) and builds on the oOh! Group's second Modern Slavery Statement for the year ended 31 December 2021.

oOh! is a values-based organisation that supports action to combat modern slavery. In CY22, oOh! launched a new set of values to work and live by, which reflects its ambition to expand the business in ethical and socially responsible ways. oOh! also increased its investment and commitment to sustainability with the creation of an Environmental and Social Governance (**ESG**) team to drive its sustainability program and embed it throughout the business operations and company culture.

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 35,000 digital and static asset locations which includes roadsides, retail centres, airports, train stations, bus stops, office towers, 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

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

revenues of \$592.6 million in 2022 and \$503.7 million in 2021.

The oOh! Group had approximately 800 employees and fixed term contractors as of 31 December 2022, working across Australia and New Zealand.

During CY22 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.

oOh! Group Supply Chains

Other than some 'whole of enterprise' engagements, which are managed by the Group Procurement function, oOh!'s 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).

The overwhelming majority of the Group's direct supplier relationships are with suppliers based in locations that have higher awareness and relatively lower risks of modern slavery, namely Australia and New Zealand.

Some higher risk locations, namely China, Malaysia and 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.

Work to date in respect of oOh!'s supply chains has accordingly focused on the risks inherent in suppliers (either tier 1 i.e. direct suppliers, or known second or subsequent tier) known to be located in higher risk geographic locations and those providing higher risk products or services, particularly where these risks intersect.

Modern Slavery Risks

As previously reported, 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.

Developing from prior years' work, oOh! has expanded the list of goods and services in its supply chains that it considers to be of potentially highest risk of modern slavery, particularly where sourced from higher risk countries. These expanded categories will be included in future due diligence investigations:

Higher Risk Products	Higher Risk Services
<ul style="list-style-type: none"> • digital display units • bus shelters and component parts • substrates/canvasses/printing inks • marketing merchandise • laptops and telco equipment, including phones • office equipment including copiers, printers, commercial printers 	<ul style="list-style-type: none"> • information technology • shipping • external processing centres used by oOh!'s direct suppliers of professional services (such as accounting, legal and banking services)

Assessing and addressing modern slavery risks

Status at start of reporting period

oOh! had, by the start of CY22, undertaken the below actions, as described in its Modern Slavery Statements for CY20 & CY21:

Actions previously taken to investigate and assess risks of modern slavery	Actions previously taken to address risks of modern slavery
CY20: Specialised procurement function established	CY20: Code of Conduct confirms commitment to address modern slavery
CY20: New vendor onboarding process introduced	CY20: Modern Slavery awareness raising training of Executives
CY20: Review of supply chains & Desktop Review of supplier data undertaken	CY20: New anti-modern slavery contract provisions introduced
CY20: Vendor due diligence questionnaire initiated	CY20: Anti-modern slavery Practice Note developed
CY21: Expansion and embedding of vendor onboarding process	CY21: Revised supplier contract terms
CY21: Focussed Vendor due diligence	CY21: Anti-modern slavery Practice Note rollout ¹
CY21: Standardised approach to modern slavery risk-assessment ¹	
CY21: 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.

Overview of actions taken in CY22

Building on the foundational work noted above, oOh! undertook the following further actions in CY22 to investigate and assess, and to address, risks of modern slavery in its supply chains:

Actions taken in CY 22 to investigate and assess risks of modern slavery	Actions taken in CY 22 to address risks of modern slavery
Expanded our view of higher risk products and services under closer review	Checking use of modern slavery risk-based contract terms
Whole-of-enterprise general ledger/accounting system	Annual reminder letter to medium-high modern slavery risk suppliers initiated
Expansion of Vendor Onboarding processes and modern slavery risk data capture	Development of draft modern slavery remediation principles for adoption.
Feasibility assessments of third party support	Training modules further developed and targeted training of staff with highest exposure to modern slavery risks
Operationising initiatives into BAU	

oOh!'s anti modern slavery working group (**AMSWG**) 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 and Accounts Payable. The newly established roles of Group Director - ESG and Manager - ESG also joined the AMSWG.

Expanded view of higher risk products and services

The AMSWG expanded its view of higher risk products and services during CY22, moving beyond its tier 1 suppliers and those where the higher risk is inherent in the product or service being sourced. For example, in CY22 oOh! began to investigate and assess some higher risk services that are provided to our tier 1 suppliers in the course of those tier 1 suppliers providing services to oOh! that, in themselves, carry lower modern slavery risk. The specific instance considered in this case was local professional services, where the tier 1 professional firms used offshore processing centres.

Whole of enterprise general ledger/accounting system

During CY22 oOh! introduced a whole-of-enterprise general ledger/accounting system which facilitates better monitoring and secures earlier identification of all new vendors and contractors. The new system now embeds vendor due diligence for all new vendors and provides enhanced reporting capability.

Expansion of Vendor Onboarding processes

The vendor onboarding processes developed during CY20-21 have now been applied consistently across all Australian and New Zealand operations. The Vendor Onboarding Form at the heart of these processes has been embedded into the new general ledger system, which promotes both:

- efficiency both of modern slavery resource efforts, sparing resources for more value-adding AMS actions; and
- better reporting.

Enhanced modern slavery risk data capture

This enhanced process of modern slavery risk data capture has been automated at two levels for more efficient collection, assimilation, and consistent storage of supplier information.

Feasibility assessments of third party support

During CY22 oOh! reviewed the effectiveness of its past vetting processes, in particular the pre-COVID practice of factory visits to assess practices on-site. Those visits were suspended during the pandemic and the result of this review was that, moving forward, oOh! would use recognised suppliers and investigate third party support as follows:

- via a specialist organisation to support identification of 'good' or 'bad' modern slavery organisations; and
- via third party audits of modern slavery risks in suppliers.

Operationalising initiatives into BAU

Initiatives introduced in oOh!'s previous AMS programs of work have become part of 'standard operations' for relevant staff, including completing/checking the vendor onboarding processes, issuing due diligence requests for all staff exposed to higher risk vendors, assessing responses against modern slavery risk assessment tools, and keeping a register of suppliers with moderate or higher modern slavery risks.

Further, initiatives that commenced as 'project work' to enhance AMS processes and procedures have also become operationalised, moving to 'annual reviews'. These include the development of a new Vendor Onboarding Form, as well as

improvements to the modern slavery due diligence questionnaire and oOh!'s responses to due diligence requests it receives.

Checking use of modern slavery risk-based contract terms

The use of increments to the standard contract terms for increasingly higher modern slavery risk profiles was introduced in CY20. In CY22 the Procurement function monitored for use of modern slavery risk-based contract terms against modern slavery risk profiles of:

- new vendors; and
- vendors whose contract terms are reviewed.

Annual reminder letter to medium-high modern slavery risk suppliers

The oOh! Group issues an annual letter to all vendors considered to have a medium-high modern slavery risk, reminding them of their obligations, and requesting that those vendors notify oOh! of any change in circumstance which may affect oOh!'s original risk assessment of them.

Developed draft remediation principles for adoption

Draft remediation principles were developed during CY22. The process of developing the principles grounded meaningful discussion and led to insights on practical and operational issues that need to be addressed to realise oOh!'s ambitions for a more effective path to combatting modern slavery within its spheres of influence.

The principles themselves were prepared in advance of executive decision in CY23. Upon wider circulation they are expected to be a focus for a more practical understanding of the connections between choices oOh! and its staff make and the accumulating upstream pressure and impact over the medium-long term of acting consistently with remediation principles that are aligned to reducing/eliminating the practices of modern slavery.

Training modules further developed and targeted training of staff

Modern slavery training materials were further developed during CY22, including:

- an extensive 'playlist' of AMS awareness-raising slides for future use by trainers/managers and executives; and
- pragmatic training materials for staff with low exposure to vendor engagements that carry modern slavery risk.

During CY22, oOh! commenced the roll out of targeted training of staff with the highest exposure to potential modern slavery risks, which will be continued in CY23.

Assessing the effectiveness of the actions taken

Review of effectiveness

As part of oOh!'s commitment to identifying and addressing modern slavery in its operations and supply chains, the AMSWG monitors and assesses the effectiveness of actions taken and reported to date.

oOh! is committed to continuously improving its approach to addressing modern slavery risks, and work is ongoing to focus the Group's anti-modern slavery efforts more effectively. During CY22 this centred on:

- increasing the automation of both data captured by oOh! in respect of its upstream suppliers, and oOh!'s responding to requests from its downstream buyers to inform their modern slavery risk assessments; and
- investigating oOh!'s options to use third party certifications and 'good/bad supplier' lists and recommendations, for executive decision in CY23.

Anti-modern slavery oversight

Modern Slavery is included in the Annual Workplan of Board Audit Risk and Compliance Committee (**ARCC**) and forms part of the oOh! Group governance and risk frameworks. It is also included in oOh!'s ESG governance oversight and noted in the Group's Sustainability Report, set out in its 2022 Annual Report available at <https://investors.oohmedia.com.au/>.

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

Consultation with Group subsidiaries

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

In addition, the work on the introduction of a new accounting system across the Group included a review and revision of the (formerly named) New Vendor Form – which was the subject of significant user feedback and some refinement as a result, including being renamed the Vendor Onboarding Form. Ongoing 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, 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 2023

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

OML's New Zealand subsidiaries

	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