# oOh!media

Modern Slavery Statement for the reporting period 1 Jan - 31 Dec 2024





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# 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!'. <sup>1</sup>

This Statement is prepared for the reporting period ended 31 December 2024 (**CY24**) and builds on the oOh! Group's fourth Modern Slavery Statement for the year ending 31 December 2023.

oOh! is committed to combatting modern slavery, and is working to promote ethical practices, transparency and accountability throughout its operations and supply chain. The actions outlined in this Statement build upon foundational work previously undertaken by oOh!, with a heightened emphasis on the most effective actions as informed by insights gained through implementing its Anti-Modern Slavery (AMS) plans in preceding years.













O1 Structure & Operations

# 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.

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 \$635.6 million in 2024 and \$633.9 million in 2023.

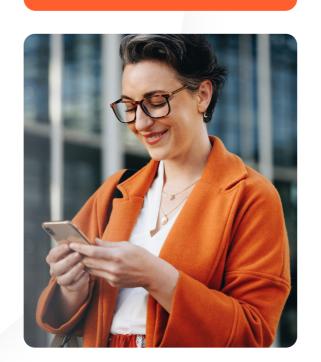
During CY24 the Group's business operations included the provision of services to customers in:

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

Operations also include the Group's corporate functions.

The oOh! Group had approximately **800 employees** and fixed term contractors as of 31 December 2024 working across Australia and New Zealand.

The oOh! Group, together with its New Zealand subsidiaries, has an extensive network of more than 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.









**02** oOh! Group Supply Chains

# oOh! Group Supply Chains

Other than some 'whole of enterprise' and higher value 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

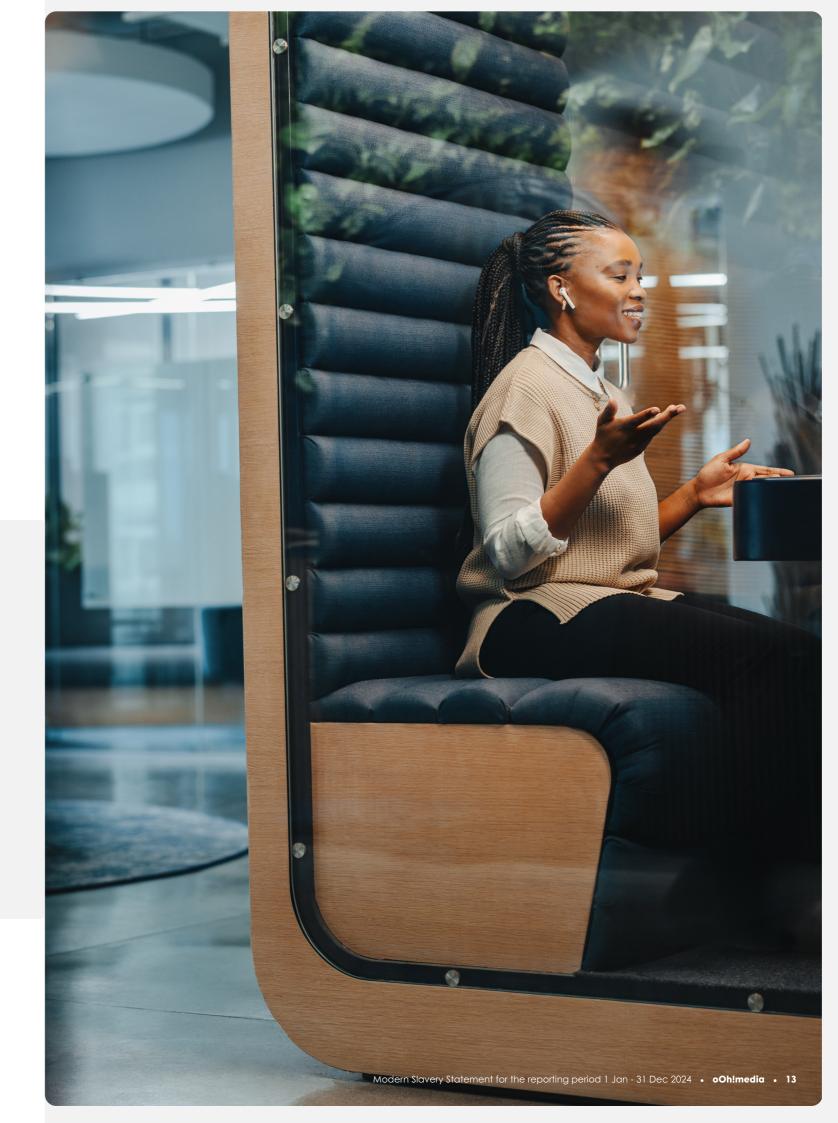
- ! Media services
- ! Technology services
- ! Content services
- Street furniture
- ! Digital billboards goods and services
- ! Printing
- ! Corporate functions (internal)

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.





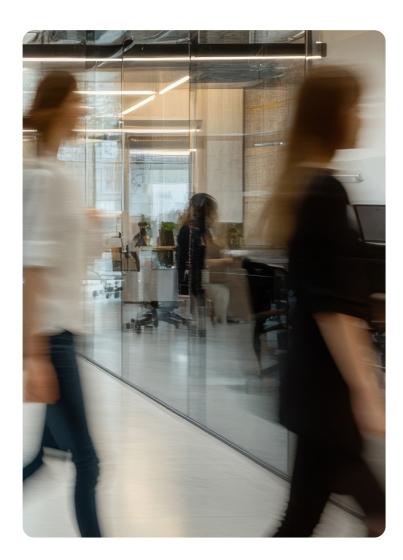
**03** Modern Slavery Risks

# 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.

Building on prior years' work, oOh! has continued to develop its due diligence practices with pre-engagement checks on vendors supplying goods and services that it considers to be of potentially highest risk of modern slavery, particularly, where sourced from higher risk countries.







# These expanded categories include:

Higher risk products	Higher risk services
Digital display units and component parts.	Information technology.
Bus shelters and component parts.	Shipping.
Substrates/canvasses/printing inks.	External processing centres used by oOh!'s direct suppliers of professional services (such as accounting, legal and banking services).
Marketing merchandise.	Cleaning of office and warehouse premises.
Laptops and related information technology equipment.	Waste management.
Office equipment including copiers, printers, commercial printers.	Construction, maintenance and posting of advertising assets.

In addition to pre-engagement assessments for higher risk categories, oOh!'s expanded due diligence practices now include an annual assessment via the Fair Supply platform of all relevant suppliers, with spend

>\$25,000.





O4
Assessing and addressing modern slavery risks

# Assessing and addressing modern slavery risks

### Status at start of reporting period

oOh! had, by the start of CY24, undertaken the below key actions, as described in its Modern Slavery Statements for CY20, CY21, CY22 and CY23.

Previous actions to investigate and assess modern slavery risks		
CY20	Specialised procurement function established.	
CY20	New vendor onboarding process introduced.	
CY20	Review of supply chains & Desktop Review of supplier data undertaken.	
CY20	Vendor due diligence questionnaire initiated	
CY21	Expansion and embedding of vendor onboarding process.	
CY21	Focussed Vendor due diligence.	
CY21	Standardised approach to modern slavery risk-assessment 1.	
CY21	Centralised record keeping.	
CY22	Expanded our view of higher risk products and services under closer review.	
CY22	Whole-of-enterprise general ledger/accounting system.	
CY22	Expansion of Vendor Onboarding processes and modern slavery risk data capture.	
CY22	Feasibility assessments of third party support.	
CY23	Expanded view of higher risk products and services AMS assessments.	
CY23	Enhanced vendor onboarding processes and modern slavery risk data capture.	
CY23	Onboarded Fair Supply third party ESG risk management and compliance solution.	
CY23	Implemented CY22 AMS initiatives into BAU.	

Previous actions to address modern slavery risks		
CY20	Code of Conduct confirms commitment to address modern slavery.	
CY20	Modern Slavery awareness raising training of Executives.	
CY20	New anti-modern slavery contract provisions introduced.	
CY20	Anti-modern slavery Practice Note developed.	
CY21	Revised supplier contract terms.	
CY21	Anti-modern slavery Practice Note rollout.	
CY22	Checking use of modern slavery risk-based contract terms.	
CY22	Annual reminder letter to medium-high modern slavery risk suppliers was initiated.	
CY22	Development of draft modern slavery remediation principles for adoption.	
CY23	Implemented standardised clauses to manage AMS risk in contracts with higher risk vendors.	
CY23	Issued periodic reminder letter to medium-high modern slavery risk suppliers.	
CY23	Continued targeted training of staff with highest exposure to modern slavery risks.	
CY23	Onboarded an online AMS awareness training provider.	

# Overview of actions taken in CY24

In CY24, oOh! expanded its commitment to ethical and socially responsible business practices with various initiatives and enhancements to its policies, procedures, and practices, including the development of the business's first Sustainability Policy.

oOh!'s AMS Working Group, (comprising the Group CFO, Group Director of Risk and representatives from the Legal, Procurement, Finance and ESG teams), played a pivotal role in advancing its AMS initiatives and embedding them throughout the business operations and company culture.

Building on the foundational work noted in the above section, oOh! undertook the additional actions set out below in CY24.

# CY24 actions to investigate and assess modern slavery risks

- Appointed Group Director of Risk.
- Developed and implemented improved vendor onboarding and management processes.
- Created the Risk Handbook and accompanying Anti Modern Slavery risk matrix for operational staff, providing guidance on assessing risk as part of the wider 'oOh! Procurement Ways of Working'.
- Implemented pre-engagement 3rd Party assessments for higher risk suppliers via the Fair Supply Spotlight tool.
- Embedded data capture for risk assessments outcomes in oOh!'s vendor platforms.

### CY24 actions to address modern slavery risks

- Delivered targeted modern slavery risk training for key operational staff and mandatory modern slavery awareness training business wide.
- Commenced issuing 'best practice' Supplier Assessment Questionnaires (SAQ) through the Fair Supply platform, replacing the CY20 questionnaire format.
- Developed and implemented an annual supplier 3rd party assessments process for all existing suppliers with spend above minimum threshold, which will facilitate improved engagement with suppliers flagged as higher risk.

### **Appointment of Group Director of Risk**

 The appointment of the Group Director of Risk in a newly created role enhances oOh!'s ability to address modern slavery risk. The establishment of a dedicated Risk function and leadership role demonstrates oOh!'s commitment to identifying, assessing, and mitigating risks in its operations and supply chains. This development supports a strategic approach to compliance with oOh! modern slavery processes and obligations, fostering accountability, transparency, and ethical standards.

# Implementation of updated Procurement processes

• With the maturation of the CY20-21 onboarding process into oOh!'s BAU, a cross-functional team was tasked with developing the 'oOh! Procurement Ways of Working'. The result was a holistic, end to end procurement process, that considers risk, as well as supplier capability and cost. The work was informed by the AMS Working Group's review of the existing vendor onboarding processes and modern slavery risk data capture. The updated policies, and procedures implemented in the 2024 'oOh! Procurement Ways of Working', included the oOh! Risk Handbook, Modern Slavery Risk Matrix and an updated Modern Slavery Practice Note.

# **ESG** management solution

 During CY23, oOh! selected and onboarded Fair Supply, a highly regarded ESG risk management and compliance solution. In CY24 the Fair Supply platform was integrated into oOh!'s vendor onboarding process to enhance our existing capabilities and provide seamless compliance. This integration further embedded AMS risk processes into oOh!'s standard operations.

- The Spotlight tool, which is a feature of the Fair Supply platform, enabled oOh! to enhance its due diligence processes by streamlining compliance assessment and monitoring capabilities. It facilitates pre-engagement checks for all suppliers flagged as higher risk by our onboarding questionnaire. The platform also allows for comprehensive annual reviews of all oOh! suppliers with a spend greater than \$25,000.
- The platform provides a basis for continuous improvement in combating modern slavery across our direct operations and supply chains by providing a supplier risk rating. The risk rating triggers further due diligence in accordance with the modern slavery risk matrix. In addition to supplier due diligence, the platform allows oOh! to compare AMS risk in its supply chains year on year.

## Implemented CY23 AMS initiatives into BAU

- Initiatives introduced in oOh!'s previous AMS
  work plan have become part of 'standard
  operations' for relevant staff. These include
  completing and verifying vendor onboarding
  processes, issuing due diligence requests for all
  staff exposed to higher-risk suppliers, evaluating
  responses using modern slavery risk assessment
  tools, and maintaining a register of suppliers with
  moderate or higher modern slavery risks.
- Additionally, initiatives that commenced as project work to enhance AMS processes and procedures have moved to annual reviews.
   These initiatives include the work on the updated Vendor Onboarding Form, adoption of the Fair Supply SAQ, as well as enhancements to oOh!'s responses to due diligence requests it receives.

# Continued use of modern slavery risk-based contract terms

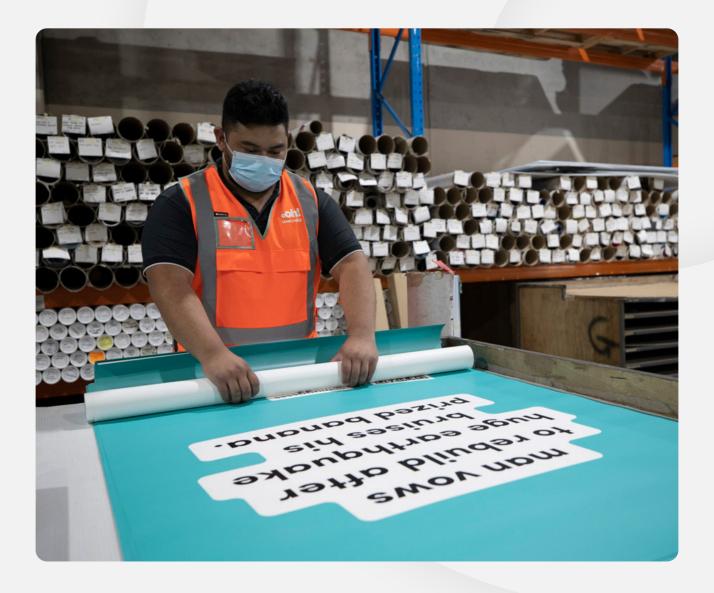
 Tiered standard contract terms for low, medium and higher risk modern slavery profiles were introduced in CY20. Their continued application in contracts for both new suppliers and existing suppliers (under contract review), has been facilitated by the Fair Supply platform risk rating. The results inform the Procurement function's application of modern slavery risk-based contract terms.

# Annual Risk Assessments and SAQs for suppliers with a moderate slavery risk

• As part of the updated AMS review process, routine annual assessment of all goods and services suppliers with a spend in excess of \$25,000 has been implemented. The Fair Supply Live Assessment tool enables an annual review of each supplier's risk rating and will trigger the re-issuing of SAQs via the Fair Supply platform in accordance with the AMS risk matrix. All supplier responses are reviewed by Fair Supply who use the additional information to provide a revised risk rating that informs further due diligence if required. The SAQ serves to remind suppliers of their obligations and informs oOh! of any changes in circumstances that may impact their risk assessment. Suppliers who fail to respond or respond inadequately are escalated to senior management in accordance with the risk matrix in the Modern Slavery practices note.

# Training and awareness

- During CY24, oOh! continued to deliver targeted training to operational staff with the highest exposure to potential modern slavery risks. The launch of oOh!'s 'Procurement Ways of Working' comprehensively covered appropriate purchasing processes and standards including consideration of modern slavery risk.
- oOh! also delivered mandatory modern slavery awareness training to all staff (including casuals and contractors) in CY24. The purpose of this training is to educate our workforce and empower them to identify and address potential risks of modern slavery in our operations, supply chain; and in the wider community.





O5
Assessing the effectiveness of the actions taken

# Assessing the effectiveness of the actions taken

### **Review of effectiveness**

oOh!, guided by the AMS Working Group, is committed to continuously improving its approach to addressing modern slavery risks, with ongoing efforts aimed at refining the Group's anti-modern slavery endeavours more strategically and effectively. During CY24 this centred on:

01

# implementing a

holistic risk review process under the purview of Procurement and the Group Director of Risk. 02.

### increasing the

automation of both data captured by oOh! in respect of its upstream suppliers, and oOh! responding to requests from its downstream buyers to inform their modern slavery risk assessments; and 03

# Investiaating

oOh!'s options to use third party certifications and 'good/bad supplier' lists and recommendations, for executive decision in CY25. 04

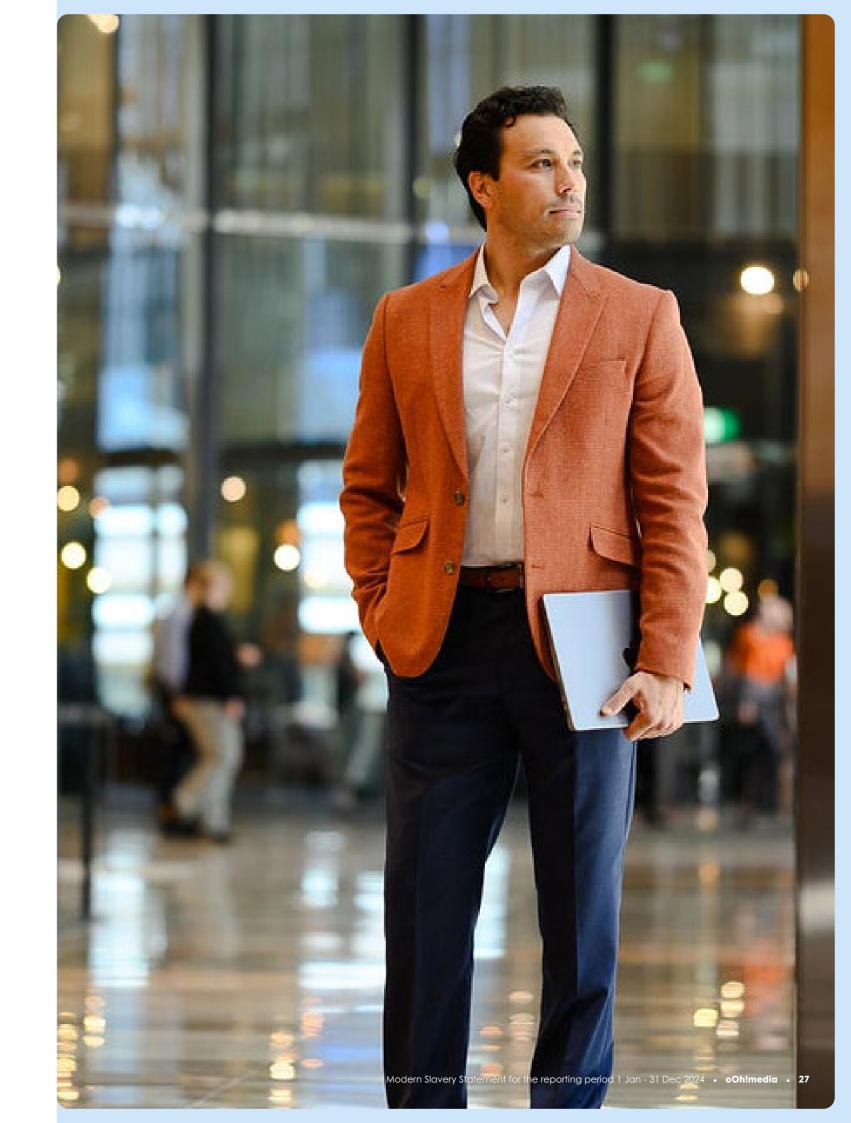
## Comparing the

outcome of supplier risk reviews year on year.

# **Anti-modern slavery oversight**

Modern Slavery is included in the Annual Workplan of the Board's Audit Risk and Compliance Committee (ARCC) and constitutes an integral component of the oOh! Group governance and risk frameworks. It is also included in oOh!'s ESG governance oversight and reported on in the Group's Sustainability Report, set out in its 2024 Annual Report available at <a href="https://investors.oohmedia.com.au/">https://investors.oohmedia.com.au/</a>.

Annual reviews of oOh!'s governance and risk frameworks, along with bi-annual reviews of all policies, are an inherent part of oOh!'s governance and risk frameworks, and are also undertaken in respect of anti-modern slavery policies and processes.

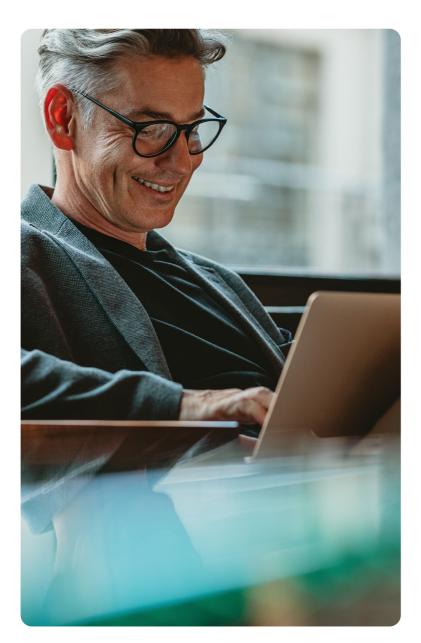




06 Consultation with Group subsidiaries

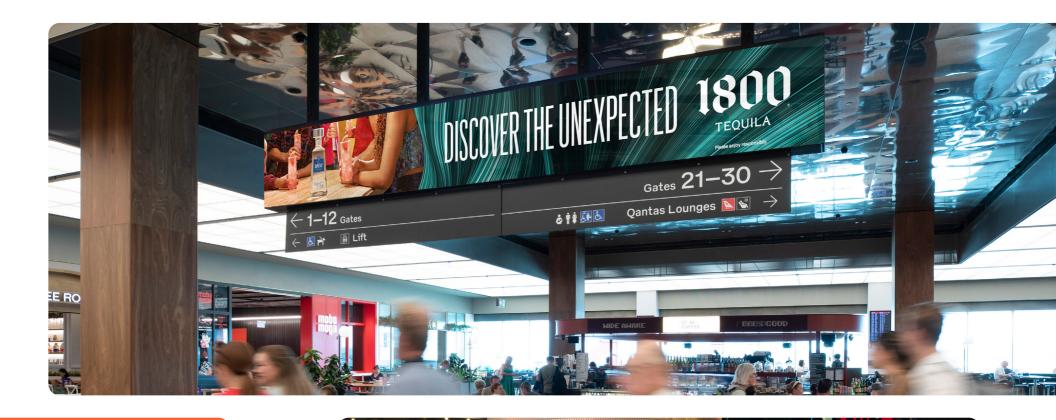
# Consultation with Group subsidiaries

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.











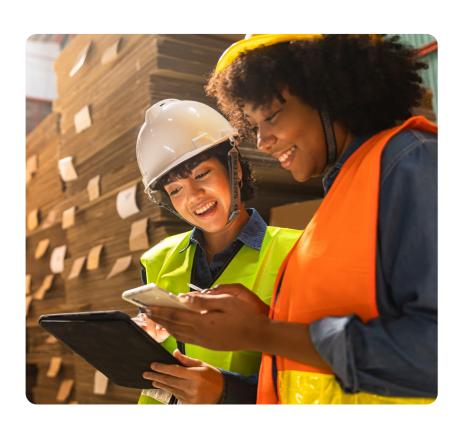


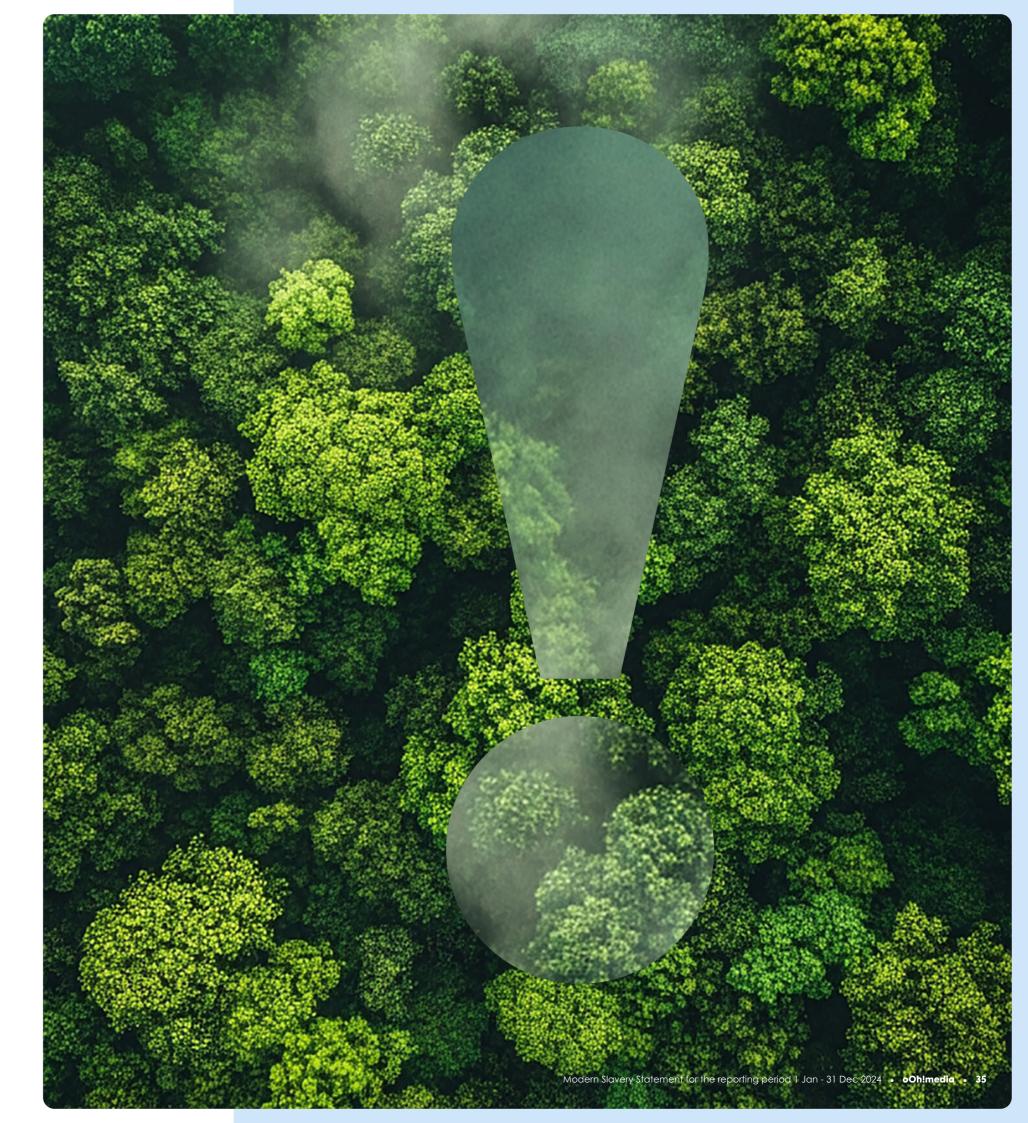
O7
Commitment to continuous improvement

# Commitment to continuous improvement

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

- 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

# 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

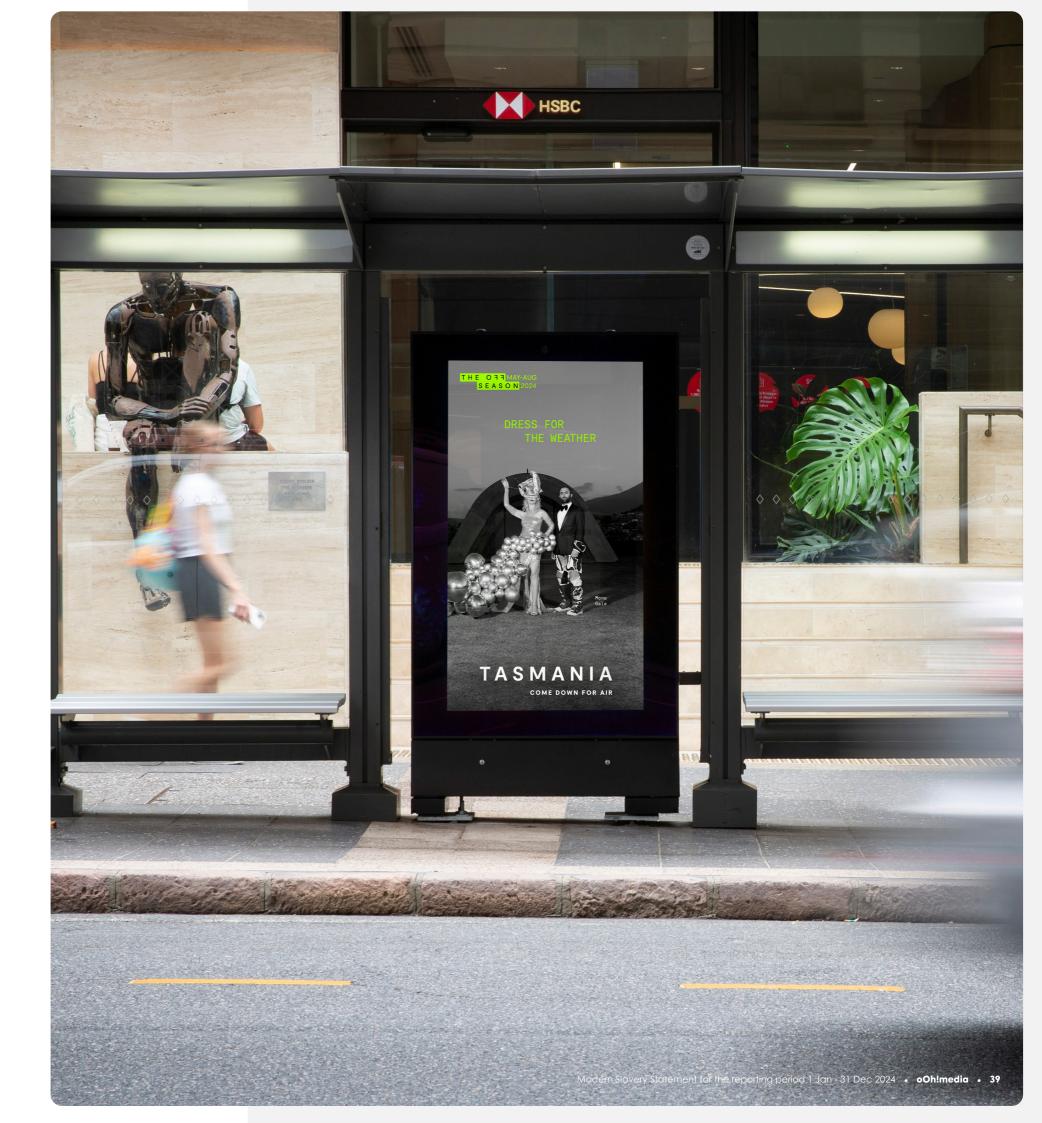
Jegel

lotomo.

Chair

Cathy O'Connor Managing Director

June 2025



# Attachment 1

# **OML's Australian subsidiaries**

Name of entity	ABN
Cactus Imaging 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	91 103 820 266
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	84 154 668 087
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**

Name of entity	NZ company no.
Calibre Audience Measurement Limited	8149503
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





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