JCDecaux

MODERN SLAVERY STATEMENT 2024



INTRODUCTION



Over the past 60 years, JCDecaux has become the global leader and innovator of Out-of-Home advertising, having first invented the concept of advertiser funded street furniture in Lyon, France.

As the world's number one Out-of-Home advertising group, JCDecaux has more than 1 million advertising panels reaching more than 850 million people worldwide everyday in over 80 countries.

JCDecaux is passionate about enhancing the cities and environments in which we operate. With a commitment to integrity and excellence in service, JCDecaux is driven by innovation and beautiful design. We aim to do this in the most environmentally sustainable and socially responsible manner, working with our partners, clients and communities to enhance environments and the cities in which we operate, while delivering advertising structures which have 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



JCDecaux Australia Holdings Pty Ltd

ABN 50 627 855 323 (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 the following Group companies, each of which is a reporting entity for the purpose of the Modern Slavery Act:

JCDecaux Australia Holdings Pty Ltd

ABN 50 627 855 323

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

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 and New Zealand, 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 assets. This includes the supply of advertising and non-advertising street furniture such as bus / tram shelters and public telephones.

ICDecaux also supplies and operates large format advertising panels and 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 New Zealand office in Auckland, employing just under 500 staff members.

*JCDecaux Australia Holdings Pty Ltd Group has noncontrolling 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. Backoffice 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.

NEW ZEALAND

The following two New Zealand companies are 100% owned and controlled by JCDecaux:

JCDecaux New Zealand Holdings Limited NZBN: 94 290 3077 1048

JCDecaux New Zealand Trading Limited N7BN: 94 290 3822 1392

As part of the Group, the operations and supply chains of the New Zealand companies have been considered for the purpose of this statement. For the reasons set out above, the modern slavery actions and mitigations set out in this statement are applicable to JCDecaux's New Zealand companies.

SUPPLY CHAIN



JCDecaux has re-assessed its supply chains relevant to the 2024 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, 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 nondigital 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.
- 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, Taiwan, India, New Zealand, Singapore, France and Germany. International suppliers are used for the procurement of some electronic screens, electronic components, printing materials, street furniture 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 represent a low prevalence of modern slavery. Secondly, Advertising and Media are not industries generally recognised as high risk for modern slavery.

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. We have a highly skilled People and Culture function who keep up to-date with the relevant local and national legislation, educate leaders across the business on what is required to comply with legislative changes, and we monitor ongoing compliance levels.

SUPPLY CHAINS: AUSTRALIA & NEW ZEALAND

CONSTRUCTION, MAINTENANCE AND POSTING OF ADVERTISING

|CDecaux 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, ICDecaux 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.³ 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.⁴ JCDecaux has a limited number of field staff required to wear work clothing which identifies them as JCDecaux employees and makes available the work clothing to its other staff, who may wear the work clothing on a voluntary basis in the course of their role. 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 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

Iln 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. We also consider the risk of lack of transparency or visibility in a supply chain of second and third tier suppliers, where for example, components sourced by suppliers from third parties for manufacturing of products may involve modern slavery practices, or there may be modern slavery practices 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.⁵ These products are sourced from France, from the United States, from China, South Korea and Taiwan. These countries represent a low to moderate prevalence of modern slavery.⁶

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 and Germany. These countries represent a low to moderate prevalence of modern slavery.⁷

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.⁸

- The Global Slavery Index 2023 ('GSI'): https://www.walkfree.org/global-slavery-index/map/
- The Global Slavery Index 2023 ('GSI'): https://www.walkfree.org/global-slavery-index/map/#mode-data:dimension-i:
 Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities, Dept of Home Affairs ('Guidance') page 44.
- Guidance page 44.
- 4. Refer footnote 3 above.
- Refer footnote 3 above.
- Refer footnote 3 above.
 Refer footnote 1 above.
- Refer footnote 1 above.
- Refer footnote 3 above.



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 values⁹ which drive quality and risk management in our operations and supply chain. Fundamental to that objective are the Group's four core Charters¹⁰:

- The JCDecaux Group Code of Ethics
- The JCDecaux International Charter of Fundamental Social Values
- The JCDecaux Code of Conduct of Suppliers
- The JCDecaux 2030 ESG Strategy

These documents 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.

Being headquartered in France, ICDecaux's French parent company, JCDecaux SE, is subject to the French anti-corruption and antibribery laws known as "SAPIN II". We have implemented compliance with these laws locally, including by introducing compliant Australian and New Zealand whistleblowing policies. 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. In 2023, JCDecaux SE strengthened its compliance function by

appointing its first Compliance Director for the international group. Off the back of this, the Group implemented a number of ESG, anticorruption and compliance initiatives which continued into 2024.

One of these was the introduction. in 2024 of a JCDecaux Group Client Charter, directed towards |CDecaux's advertising clients. It sets out to clients the principles of social responsibility which JCDecaux stands for, as recorded in the core Charters referred to above. As part of the implementation of the Client Charter, all clients who represent 1% or more of JCDecaux's total advertising revenue, including at the local Australia and New Zealand level. were assessed to ensure alignment with JCDecaux's social values, including those relating to forced labour, child labour, and universal human rights.

Additionally in 2024, JCDecaux:

- implemented a new online Group Whistleblowing platform "Whispli" to streamline notification and management of whistleblowing disclosures
- implemented the JCDecaux Group internal Policy on Conflicts of Interest
- implemented the JCDecaux

- Group internal procedure relating to Sponsorship & Patronage Operations
- expanded the local Australia and New Zealand Workplace Conduct Policy to include specific anticorruption provisions
- implemented a local Australia and New Zealand Gifts, Invitations and Other Benefits Policy

While not all of these initiatives directly impacted modern slavery mitigation, they form part of JCDecaux's ongoing efforts to implement and maintain the highest standards of ethical compliance in our organisation.

MITIGATION ACTIONS

Since 2023, JCDecaux has maintained a dedicated Environmental, Social and Governance (ESG) function. The Head of ESG oversees JCDecaux's local ESG Steering Committee, which is comprised of members from different parts of the organisation, including Operations, Sales, Legal, Finance, and Commercial. The Committee's remit covers all aspects of ESG for the Australia and New Zealand business, including matters relating to procurement and 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, JCDecaux SE has a global Purchasing Policy which is based on responsible and sustainable purchasing practices. JCDecaux 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 JCDecaux's Supplier Code of Conduct.

JCDecaux's Supplier 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 most cases, suppliers will sign and agree to ICDecaux's Supplier Code of Conduct but in some cases, suppliers have their own Code of Ethics or Code of Conduct, encompassing values aligned to JCDecaux's Charters. In that event, ICDecaux 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 ICDecaux's Code of Conduct in order to be acceptable.



In particular, JCDecaux puts a focus on its "Key Suppliers". A "Key Supplier" for JCDecaux is not defined solely by reference to annual spend or business criticality, but by taking into account at-risk sectors, including printers, providers of work clothes, providers of composite material, and providers of digital screen technology for outdoor advertising.

All suppliers are categorised according to a strict evaluation process which takes into account the nature of the supplier's business, the supplier's performance during previous evaluations, and volume of business with JCDecaux.

The supplier classification assesses the degree of risk from a 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. Under the evaluation system, a risk assessment questionnaire has been developed for use at the onboarding stage. 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.

BUSINESS OPERATIONS

While JCDecaux assesses the risk of modern slavery practices in its direct business operations as low, JCDecaux continues to mitigate its risks by undertaking an annual remuneration review for its employees. This review includes assessing the employee's wage against the national minimum wage according to employment type, age and work capacity to ensure we are compliant. Further, at the start of an employee's employment, JCDecaux verifies 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.

In addition, JCDecaux has a minimal number of fixed term employment contracts and does not regularly use labor hire organisations to undertake work. In instances where JCDecaux uses independent contractors, JCDecaux pays those organisations or contractors an amount equal to or above market rate for the services provided.

- 9. https://www.jcdecaux.com/sustainable-development/oustrategy
- https://www.jcdecaux.com/sustainable-development/socialpriorities
- https://www.jcdecaux.com/our-ethic



ASSESSING EFFECTIVENESS

JCDecaux actively monitors and reviews the effectiveness of its actions, primarily through the Procurement and Operations Business Units.

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 outdoor advertising. From an ethical and social perspective, we also concentrate on manufacturers from higher risk geographical territories. In 2024, 100% of our Key Suppliers were assessed.

All Key Suppliers are audited at least annually. This includes an annual risk assessment questionnaire completed by each of the Key Suppliers, and may include onsite audits for high risk or high value suppliers, where that is reasonably practicable. In

addition, supplier contracts are reviewed on a case by case basis as supplier contracts come up for extension or renewal. In 2024, JCDecaux expanded its annual risk assessment questionnaire to include questions specifically addressing the key supplier's modern slavery mitigation actions.

The questionnaire now asks if the key supplier:

- 1. Is required to submit a Modern Slavery Statement under modern slavery legislation;
- 2. Has any policies or standards addressing its modern slavery risks and actions;
- 3. Has been involved in or convicted of any offences or breach of laws relating to labour or employment;
- 4. Undergoes regular training of its staff to identify and respond to modern slavery risks; and
- 5. Has investigated their supply chains for the purpose of identifying any modern slavery risks.

Upon the completion of the questionnaire, JCDecaux reviewed each key supplier's responses to the modern slavery questions and that supplier's Modern Slavery Statement or Policy (where that supplier had a Statement or Policy). JCDecaux has engaged with its key suppliers to improve their modern slavery mitigation actions. This will continue in 2025.

In 2024:

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

Finally, 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 2024.



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 March 2024. The Internal Audit function provides an extra layer of accountability to compliance and best practice across all areas of the business, including procurement and modern slavery.

CONSULTATION

As described above in this Statement (refer page 5), the entities in the Group operate as a wholistic husiness. Consultation with all areas of the husiness was achieved primarily via the ESG Steering Committee (described on page 13), which included senior managers representing all relevant parts of the 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.

APPROVAL

This statement is submitted jointly by JCDecaux Australia Holdings Pty Limited, JCDecaux ANZ Pty Ltd, APN Outdoor Group Pty Ltd and JCDecaux Australia Trading Pty Ltd as Reporting Entities. This statement was approved by the board of each Reporting Entity on 27 June 2025.

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Max Eburne Co-Chief Executive Officer and Director

David Watkins
Co-Chief Executive Officer
and Director



