



**Modern Slavery Statement**  
for the reporting period 1 Jan - 31 Dec 2020

## Introduction

oOh!media Ltd (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 2020 (**FY20**) and is the oOh! Group's first Modern Slavery Statement.

oOh! is 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 during and prior to FY19 and subject to continuous improvement in FY21. As oOh!'s first Modern Slavery Statement this Statement identifies that foundational work.

This Statement also identifies some actions completed in Q1 FY21.

## 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 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 \$426.5 million in 2020 and \$649 million in 2019.

The oOh! Group has 730 Australian-based employees as at 31 December 2020. A further 150 staff are employed by the Group's New Zealand subsidiaries.

The Group's business operations include the provision of services to customers in:

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

Operations also include the Group's corporate functions.

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<sup>1</sup> 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/digital publishing, 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 2020 the oOh! Group's<sup>1</sup> direct suppliers were located<sup>2</sup> across geographic regions as follows:

Location <sup>2</sup>	FY20 spend % <sup>1</sup>
Asia	2.54
Australia	91.85
Europe	0.06
New Zealand	3.14
North America	2.33
Not specified	0.08

- 1 Percentages are based on suppliers across the aggregate oOh! Group and its New Zealand subsidiaries.
- 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.

As this table indicates, the overwhelming majority of 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. Further work is required to identify original sources of supplies in respect of some of these providers to determine any higher risk countries of origin.

Foundational work in and prior to FY20 has focussed on the risks inherent in suppliers (either first tier or known second or subsequent tier) that are located in higher risk locations.

## Modern Slavery Risks

Given the unique nature of the inventory of the Out of Home media industry, the oOh! Group's licences and leases on which signage is installed constitute a significant component of its inventory and so its supply chain, but as Australian real property, represent a low inherent risk of modern slavery.

In respect of other oOh! supply chains, lower risks of modern slavery exist where supply chains' 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.

Based on modern slavery risk analysis undertaken in FY19 and a further desktop review of oOh's suppliers in FY20, the highest modern slavery risk categories of goods and services in oOh's supply chains have been identified as:

- information, communication and technology (**ICT**) assets, including componentry for digital signage and software as a service

- bus shelters and components
- marketing merchandise
- substrates (canvases), inks, paper, labels and packaging for the printing business
- shipping.

Of these products and services, the Group’s initial focus has been on those where there are known instances of products being sourced in higher risk countries. This approach is consistent with United Nations Guiding Principles on Business and Human Rights (Principle 17) to focus on areas of operations and supply chain where modern slavery risks are likely to be most significant.

The risks of modern slavery increase with the length of supply chains, which hinder:

- visibility of indicia of modern slavery; and
- leverage, both to investigate where indicia are present and to effect change where this is required.

## Actions taken to assess and address modern slavery risks

This section outlines the foundational actions taken by oOh! to address the risks of modern slavery in its supply chains. As this is the Group’s first Modern Slavery Statement, some of these foundational actions were commenced prior to FY20.

### Overview

Actions that have been taken to investigate and assess risks of modern slavery	Actions that have been taken to address risks of modern slavery
Specialised procurement function	Code of Conduct
New vendor onboarding process	Awareness raising training of Executive
Review of supply chains & Destop review of supplier data	New modern slavery contract provisions
Vendor due diligence questionnaire	Anti-modern slavery practice note
Factory site visits	

### Specialised procurement function

A specialised procurement function was established early in FY20, with a small dedicated team of procurement professionals.

Established to enhance procurement disciplines and practices, this function has also specifically facilitated oOh’s modern slavery initiatives through application of its specialist skillset and introducing an increased consistency of approach to supplier engagement across the Group, including in relation to modern slavery actions.

### New vendor onboarding process

During FY20, OML developed a new vendor engagement process and tool designed to capture information to facilitate assessment of modern slavery risks (as well as other operational risks) in respect of all new vendors.

Use of the tool is supported by guidance notes and the new process is regulated by a mandatory written process, under a new Vendor Engagement Practice Note, which now forms part of oOh’s governance framework. Initiated in FY20, the tool was finalised and rolled out at the end of Q1 FY21. It is required to be completed before any new vendor is processed through the Group’s primary accounts payable system.

## Review of oOh!'s supply chains & Desktop review of supplier data

In anticipation of the Modern Slavery Act, oOh! undertook a review of its supply chains in FY19, identifying the industries, types of products and services, countries and types of entities involved in the Group's operations. This review involved engagement with operational staff in the various businesses across the oOh! Group, focussing on Group subsidiaries that engaged in significant procurement. This review primarily addressed issues in respect of direct suppliers, except where Group members had visibility or awareness of upstream modern slavery risk factors.

That initial review was supplemented by a desk top review during COVID-impacted FY20, analysing information held in oOh's key accounts payable systems, as augmented by:

- ASIC records in respect of ABNs and
- website checks of supplier websites to determine if modern slavery statements were issued by oOh!'s 100 top suppliers by spend plus an additional group identified as supplying products that are inherently higher risk for modern slavery and/or from higher risk locations.

## Vendor due diligence questionnaire

A modern slavery-specific due diligence questionnaire was initiated in FY20 for use in respect of suppliers assessed in the course of the Group's initial review and desktop review to be the top priorities for further investigation.

The first group of such suppliers were identified in Q1 FY21, with initial tranche of questionnaires sent to this group and responses received and reviewed then. Responses did not identify instances requiring further review from a modern slavery perspective and provided further data as to 2<sup>nd</sup> and subsequent tiers in these supply chains.

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

## Factory site visits

For some years when dealing with intermediaries who source manufactured goods for oOh!, the Group has undertaken (or required the supplier to undertake) site visits of the factories manufacturing the goods. This is particularly the case in respect of product manufactured in high risk countries. Such site visits were instituted for quality assurance and sustainability purposes, but are expanding to include modern slavery risks.

This program is performed by oOh! personnel with the assistance of intermediary suppliers. Sites visits were last conducted by the Group in FY19, with FY20 visits suspended due to the COVID-19 pandemic. Virtual site visits are in planning for FY21.

To date no modern slavery issues have been identified as a result of these supplier visits.

## Code of Conduct

The Group's Code of Conduct is the foundation for all behavioural standards within the oOh! Group and a central component of the Group's governance framework.

The Code of Conduct was revised in FY20 specifically to identify and acknowledge modern slavery risk and raise Group awareness of it. This revision was approved by the OML Board in Q1 FY21.

The Code of Conduct is supported by the Group's Whistleblowing Policy which provides an avenue for employees to raise concerns, such as violation of human rights issues or non-compliance with the Code of Conduct or Group processes, including the new vendor onboarding process described below.

The Code of Conduct and Whistleblowing Policy are available at [www.oohmedia.com.au/investor-centre](http://www.oohmedia.com.au/investor-centre).

## Awareness raising training of Executive

Modern slavery and the requirements of the new laws were the subject of awareness raising training with the Group Executive during FY20.

## New modern slavery contract provisions

During FY20 the Group prepared modern slavery-specific template provisions for inclusion in supplier agreements and progressively incorporated these into its supplier terms as new arrangements were entered into and existing arrangements renewed.

In some cases the template terms were subject to negotiation, with those negotiations informing continuous improvement.

## Anti Modern Slavery practice note

During FY20, the assessment of modern slavery risk and determination of how to respond to enhanced risk has been confined to a specialist modern slavery working group, pending the development of an Anti-modern Slavery (AMS) practice note to underpin wider awareness of both modern slavery risk and organisational requirements in response. The AMS practice note will constitute part of the Group's mandatory processes under its governance framework.

Development of this AMS practice note began in FY20, to include:

- how to identify increased modern slavery risks in the Group's supply chains; and
- mandated escalated responses based on modern slavery risk of suppliers when engaging with them.

This development work was paused to focus on the new vendor onboarding procedures, but has recommenced following the Q1 FY21 rollout of those procedures.

## Assessing the effectiveness of the actions taken

During FY20 many of the Group's foundational actions in response to modern slavery risks were still being developed and rolled out, with effectiveness assessments limited to the operational lessons of the roll-out, based on:

- the observations of the specialist team developing and implementing the modern slavery initiatives
- staff uptake and ease of uptake of new procedures, as advised by staff
- supplier engagement and negotiations in response to new contract terms.

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 themselves and will be undertaken also in respect of modern slavery risks and responses.

More objective measures to assess the effectiveness of the Group's actions in response to modern slavery laws will be developed with increased exposure to the operation of the modern slavery regulatory regime, but are likely to be informed by:

- whistleblowing alerts or informal reporting
- monitoring and spot checking information provided by staff during vendor onboarding to assess effectiveness of staff awareness raising and obligations to capture supplier information
- supplier responsiveness to due diligence questionnaires and to any potential reliance on contractual rights to certifications, inspections or audits.

## 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 FY20 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 supply chain review, referenced above, involved significant outreach by the working party to engage with those parts of the Group for which procurement is a significant responsibility, in particular of assets or from locations considered higher risk from a modern slavery perspective. This consultation was 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 Statement.

## 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

28 June 2021



Cathy O'Connor  
Managing Director

28 June 2021

## Attachment 1

### OML's Australian Subsidiaries

(together with OML, these constitute "the oOh! Group" for the purposes of this Statement)

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
Junkee Media Pty Limited	45 091 839 468
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