

Modern Slavery Statement

1. Introduction

This is the Modern Slavery Statement issued jointly by Multi Market Services Australia Holdings Pty Ltd (ACN 000 026 228) (“**MMS**”) and its subsidiaries Publicis Media Australia Pty Ltd (ACN 001 786 858), Publicis Communications Australia Pty Ltd (ACN 001 720 921) (these entities together referred to as “**Publicis**”, “**we**” and “**our**”). This statement also includes consideration of the activities undertaken by Publicis Sapient Australia Pty Limited (ACN 082 145 891) and other operating subsidiaries of MMS during the reporting period. Any dormant or non-trading subsidiaries of MMS that had no operations, employees or supply chains during the reporting period are not separately described in this statement.

Pursuant to the *Modern Slavery Act 2018* (Cth), this statement sets out the actions taken by Publicis to identify, assess and address risk relating to modern slavery within its business and supply chains for the year ended 31 December 2025.

This statement will be submitted for publication on the Australian Government’s Modern Slavery Statements Register.

2. Our Corporate Structure

Founded in 1926, Publicis Groupe (the “**Groupe**”) is the largest international communications group in the world, operating in more than 100 countries, including Australia, France, the United States of America and the Netherlands. Publicis Groupe joined the United Nations Global Compact in 2003 and is a signatory of the United Nations Women Empowerment principles.

In Australia, the operations of the Groupe include businesses providing services in the public relations, advertising, marketing and digital sectors including brand design, brand strategy, data management, customer analytics, media planning and buying, website and social media advisory services, digital business transformation, e-commerce and management consulting.

The Australian operations of the Groupe are conducted through the use of MMS as the holding company for the other Groupe entities which operate in Australia. During the reporting period, the operating entities operated through MMS were as follows (excluding any dormant or non-trading entities with no operations, employees or supply chains):

- Publicis Sapient Australia Pty Limited (ACN 082 145 891).
- Publicis Communications Australia Pty Ltd (ACN 001 720 921).
- Publicis Media Australia Pty Ltd (ACN 001 786 858).
- Publicis Red Lion Pty Limited (ACN 098 273 539).
- Balance Internet Pty Ltd (ACN 130 025 393).
- Citrus Global Holdings Pty Ltd (ACN 615 424 096).
- Citrus International Pty Ltd (ACN 614 763 307).
- Zeus Enterprise Australia Pty Ltd (ACN 601 736 270).
- Atomic Search Pty Ltd (ACN 133 006 041).
- 212 Ignite Pty Ltd (ACN 139 778 564).
- XPO Brands Pty Ltd (ACN 162 579 893).

- XPO Talent Pty Ltd ACN 643 940 943.

Through the above entities, Publicis operates under the following business names in Australia: 212 Ignite, Apex Exchange, Arc, Atomic Search, Balance Internet Australia, CitrusAd-AU, Digitas Australia, Digitas Health, Epsilon, HerdMSL, Influential, Leo, Mars United Commerce, Performics Australia, Prodigious Australia, Publicis Media Exchange, Publicis Red Lion Australia, Publicis Sapient, Publicis Production, Publicis Australia, PXP, Razorfish Australia, Re:Sources Australia, Saatchi & Saatchi Australia, Saatchi & Saatchi Wellness, SalterBaxter Australia, Spark Foundry Australia, Starcom Australia, Team One, Yieldify and Zenith Australia.

This statement is made after consultation with the above entities, which, due to the structure and management of the Groupe's operations in Australia, utilise many of the same policies and processes and also have numerous shared suppliers.

Of the subsidiaries of MMS, only Publicis Media Australia Pty Ltd (ACN 001 786 858) and Publicis Communications Australia Pty Ltd (ACN 001 720 921) meet the consolidated revenue threshold required for mandatory reporting. This statement is made by MMS jointly with those entities and includes consideration of the operations of the other subsidiary entities of MMS which do not meet the mandatory reporting threshold. Due to the commonality of the policies, processes and suppliers between entities, as well as the oversight of each of the entities owned by MMS by senior management personnel, it is appropriate to provide a single joint statement for all of those entities.

3. Janus – the Groupe Code of Conduct

Publicis Groupe's approach to preventing modern slavery and upholding human rights is underpinned by Janus, the Groupe's Code of Conduct and Ethics, which applies to all employees without exception. Janus sets out the ethical principles, standards of behaviour and operational rules that govern how we conduct our business and how we expect our people to act.

Janus incorporates a suite of policies and rules that are directly relevant to modern slavery risk management, including:

- **HR General Policies & Rules**, which address fair employment practices, employment conditions and compliance with applicable labour laws;
- **Impact & Social Equity**, which promote respect for human rights, inclusion, equity and responsible business conduct;
- **Harassment & Workplace Violence**, which enshrine a zero-tolerance approach to harassment, discrimination and violence in the workplace;
- **Health, Safety & Security**, which set expectations for providing a safe and secure working environment for employees;
- **Reporting Concerns (Whistleblowing)**, which provide secure mechanisms for employees to raise concerns, including unethical behaviour or potential human rights impacts, without fear of retaliation.

These policies collectively establish clear expectations around ethical conduct, employee treatment and respect for human rights across the Groupe's operations.

To support effective implementation of Janus, mandatory training on the Code of Conduct is provided to all employees. In the 2025 reporting year, 95% of the Groupe's

employees globally completed mandatory Janus training, reinforcing awareness of ethical standards, employee rights and mechanisms for raising concerns.

4. Our Supply Chain

Publicis Groupe applies a structured supplier due-diligence approach through its procurement and vendor management processes. As outlined in the Groupe's Universal Registration Document, supplier due diligence is conducted across five key areas of risk, enabling the Group to identify, assess and manage potential risks, including those relating to modern slavery and human rights.

At a high level, these five areas include:

- Risk and financial analysis, which considers supplier risk exposure, including the identification of potential major controversies;
- Anti-corruption and bribery;
- Data protection;
- Information systems security; and
- Corporate social responsibility (CSR), social and environmental impacts, which explicitly encompass human rights and fundamental freedoms.

This due-diligence framework informs how the Group engages suppliers and assesses risk across the procurement lifecycle. Due to the nature of our operations, we engage numerous suppliers in a variety of different industries. Those suppliers provide goods and services necessary for the operation of our business in categories including:

- Production materials, production services and production studios;
- Professional services, such as legal, research, financial and recruitment services;
- Talent acquisition;
- Equipment hire;
- Catering;
- Building rental and facility management;
- Media;
- Office supplies;
- Cleaning services;
- IT services;
- Temporary labour services;
- Travel; and
- Employee benefits and healthcare.

It is our preference to engage with local suppliers and for this reason we primarily use suppliers who are based in Australia. We also engage with overseas suppliers. These suppliers are primarily based in the United States of America, New Zealand and Singapore, however from time to time we engage with suppliers in countries including Canada, Denmark, Ireland, Germany, the United Kingdom, Ireland, Malaysia, Taiwan, Thailand, South Korea and India.

We recognise that the risk of modern slavery related issues arising in relation to a supplier will vary depending on the services provided by a supplier. This is a matter which we take into account in engaging with our suppliers.

5. Risks of Modern Slavery

Due to the industry in which we operate, as well as the Australian location of our operations, we continue to assess the risk of modern slavery issues arising in our supply chains as being minimal. Notwithstanding this minimal level of risk, we recognise the ongoing risk of modern slavery issues arising, take issues relating to slavery and human trafficking very seriously, and remain committed to preventing modern slavery in all of its forms from occurring.

During the 2025 reporting year, we engaged approximately 1,800 employees based throughout Australia, primarily in New South Wales, Victoria and Queensland. Publicis aims to be an employer of choice in relation to all of our employees, and we are committed to ensuring that the terms and conditions under which our employees work are in compliance with and exceed all legal standards. To achieve this commitment, we have a significant human resources function in place which oversees those terms and conditions, as well as the wellbeing of our employees. We also have workplace policies and procedures which are regularly reviewed to ensure compliance with all applicable workplace laws. These measures create substantial protection for our employees and as a result, the risk of modern slavery issues arising directly within our own workforce is virtually non-existent.

Though we have assessed the risk of modern slavery arising in our supply chain as minimal, we recognise that the risk is not non-existent. Considering our operations as a whole, we have assessed that the primary risk of modern slavery issues arising in our supply chain is through Publicis becoming linked to modern slavery issues through the practices of suppliers with which we engage. We have identified that suppliers engaged by Publicis outside of Australia, as well as suppliers engaged in higher risk industries, such as those who provide cleaning, security and catering services, represent the greatest risk of modern slavery issues arising in our supply chains. We recognise this risk and have implemented processes with respect to our suppliers to minimise the chance of this risk eventuating.

Publicis recognises that modern slavery issues are a significant and ongoing concern and we will continue to take steps to further minimise the risk of modern slavery arising in our supply chains. Relevant external audits were conducted as part of the Groupe's global audit program during the reporting period and informed ongoing risk management activities..

6. Reducing the Risk of Modern Slavery in our Supply Chain

In 2003 the Publicis Groupe was the first communications group in the world to sign the United Nations Global Compact. Principles 4 and 5 of the Global Compact deal directly with the elimination of child labour and all other forms of forced and compulsory labour. These principles are important to us and have been adopted in the way we conduct our operations. Publicis remains committed to the principles of the United Nations Global Compact.

To ensure appropriate oversight and management of our suppliers, we have a procurement team which directly manages a large number of our suppliers. This procurement team has robust and documented procurement processes in place for engaging with new suppliers managed by them which involve due diligence checks being completed on all suppliers prior to their engagement. These checks include

consideration of matters which may suggest a risk of modern slavery issues arising in the supply chain of that supplier. Due to the procurement processes which we have implemented, Publicis considers the risk of modern slavery issues arising in relation to our suppliers to be minimal.

We also engage with other suppliers which are not managed by our procurement team, both on a day-to-day basis and in relation to specific projects or events. Due to the goods and services provided by these suppliers, we consider them to be at a low risk of being involved with modern slavery issues.

CSR for Business Guidelines

Publicis has in place, and had in place throughout the reporting period, CSR for Business Guidelines, including Article 2 – Social, Labour & Human rights general principles, which set expectations for the promotion of safe labour and fighting against modern slavery, human trafficking, child and forced labour and all forms of discrimination and violence.

During the 2024 reporting year, we reviewed our CSR for Business Guidelines and implemented updated guidelines which expanded the number of issues covered, including requiring disclosure of any human rights issues which arise in relation to our suppliers. In particular, the updated CSR for Business Guidelines provided to our suppliers include details of our confidential whistleblowing reporting system (Article 4 – Disclosure of incidents and Alert system), which provides a mechanism by which suppliers, their employees, or employees of Publicis can disclose any human rights issues or other issues they are aware of with the intention of allowing Publicis to prevent, mitigate or remediate negative impacts upon value chain workers.

Once suppliers are selected by our procurement team, the standard contractual terms utilised for our suppliers include a term that the supplier will comply with our CSR for Business Guidelines and will implement equivalent standards within its organisation. Regardless of the contractual terms in place with a supplier, all of our procurement managed suppliers are requested to adhere to our CSR Guidelines, including those guidelines with respect to safe labour and fighting against modern slavery.

CSR Assessments

Suppliers above a spend threshold are required to undertake a CSR assessment and to sign our CSR Guidelines as an acknowledgement of our expectations regarding matters including modern slavery.

The CSR assessment required by Publicis aims to educate suppliers and assess each supplier's engagement and actions on: CSR Strategic commitment, Social & Labor policies and practices (which includes human rights and issues related to modern slavery), Anti-discrimination and equal policies, Training & development, Diversity & Inclusion, Work-Life Balance, Communities' activity, Ethics Principles, Anti-corruption & bribery, Data protection & privacy, Security & Business continuity, Environmental policy and priorities. Suppliers are also specifically asked whether they have policies and processes to address human rights and whether their policy covers human rights, women's rights, modern slavery, human trafficking and child labour. Suppliers are also specifically asked whether they have a policy to address modern slavery and are requested to provide a copy of that policy.

In addition to the CSR self-assessment, suppliers managed by our procurement team are also encouraged to complete a third-party CSR assessment (for instance, through Ecovadis) which includes questions regarding human rights, labour regulations, equal opportunities and related issues. Potential suppliers who do not comply with our CSR for Business Guidelines will not be selected as suppliers.

During this reporting period, Publicis has also implemented an environmental, social and governance questionnaire in Australia which is used to obtain more information from our Australian small and medium-sized suppliers in order to ensure compliance with United Nations Global Compact and human rights and labour principles.

Other Engagement with Suppliers

To further minimise the risk of modern slavery issues arising in our supply chain, our procurement team conducts regular searches and checks in relation to existing suppliers to ensure no issues are discovered which may give rise to concerns regarding matters including modern slavery issues.

Publicis has also commenced value worker chain audits for vendors in some categories to ensure suppliers comply with forced labour policies, responsible recruiting procedures and minimum international standards and labour laws. These audit activities inform Publicis' ongoing assessment and management of modern slavery risks in its supply chain.

Response to Modern Slavery Issues Arising

In the event any concern was raised with Publicis, or Publicis became aware of any fact, matter or circumstance which may suggest the possibility of modern slavery issues existing in relation to a supplier, we would take steps to investigate that supplier to ensure there is confidence that modern slavery issues do not exist in that supplier's supply chain. Further, were Publicis to become aware of any modern slavery practices within the supply chain of a supplier, we would not engage with, or would cease engaging with, that supplier.

7. Alert Mechanisms and Whistleblowing

Publicis Groupe has established a formal whistleblowing and alert system that is accessible to both employees and external stakeholders, including suppliers. This system enables concerns to be raised, including those relating to modern slavery, human trafficking or other human rights issues.

Reports can be submitted through the Publicis Groupe external whistleblowing platform: <https://publicis.whispli.com/lp/ethicsconcerns>.

Alerts are managed by the Groupe Compliance Department and the Publicis Groupe Secretary General and are handled in a strictly confidential manner. Individuals who report concerns in good faith are protected from retaliation, in accordance with applicable laws and internal policies.

Where misconduct by a supplier is identified, Publicis reserves the right to take appropriate action, which may include suspension or termination of the commercial relationship, by all means permitted by law.

8. Assessing Effectiveness of our Modern Slavery Mitigation Measures

In line with our commitment to preventing modern slavery in all of its forms, Publicis continually assess the steps we take to mitigate the risk or any modern slavery related issues arising in our supply chain. We also ensure those steps continue to allow us to effectively address any issues which do occur and to deal with corporate social responsibility matters generally. While the Publicis Groupe globally has taken these steps since it signed the United Nations Global Compact in 2003, Publicis in Australia has placed an increased focus on these matters over the past few years and has implemented a variety of changes to our procurement processes, the way suppliers are engaged, as well as the information and representations required from suppliers, to ensure our approach to preventing and addressing modern slavery issues is appropriate and effective.

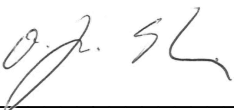
While modern slavery remains an ongoing issue and risk in supply chains, we intend to continue our approach of continuous assessment and improvement moving forward to uphold our commitment to fighting slavery and human trafficking in all of its forms. We do so with the recognition that modern slavery is an ongoing and evolving issue and that our responses to it need to similarly evolve. Accordingly, we will continually review the effectiveness of the measures we have implemented to minimise the risk of modern slavery within our supply chain. In doing so, we will also consider what further steps we can take to minimise these risks and to better understand how modern slavery can arise in our supply chain to allow it to be effectively addressed.

9. Consultation

We have consulted with the relevant procurement and human resources functions of each of our subsidiary entities in preparing this statement. Each of those procurement and human resources functions have confirmed the matters contained in this statement are true and correct.

10. Approval

This statement has been approved by the Board of Multi Market Services Australia Holdings Pty Ltd on 18 May 2026 on behalf of itself and its subsidiary companies, including Publicis Communications Australia Pty Ltd and Publicis Media Australia Pty Ltd.



Oujin Shim
Director
Multi Market Services Australia Holdings Pty Ltd
