



QMS MEDIA PTY LTD

MODERN SLAVERY POLICY

## QMS Media Pty Limited

### Modern Slavery Policy

#### 1. APPLICATION AND SCOPE

The QMS Media group consists of QMS Media Pty Limited and all other related entities of QMS Media Pty Limited (**QMS Media**).

This Modern Slavery Policy (**Policy**) applies to:

- a) distributors, suppliers, contractors or consultants who supply goods and services to QMS Media (whether paid or unpaid) and, their employees (**Supplier**);
- b) employees of QMS Media;
- c) directors and officers of QMS Media;
- d) any other third-party representative; and
- e) any person notified that this Policy applies to them.

QMS Media expects all who have, or seek to have, a business relationship with QMS Media to familiarise themselves with this Policy and to act in a way that is consistent its values.

If this Policy differs from applicable law, QMS Media will apply whichever is more stringent.

#### 2. PURPOSE

As a market leader in out of home advertising, QMS Media is committed to fostering a culture of ethical behaviour and good corporate governance. This Policy is an expression of QMS Media's commitment to limiting the risk of modern slavery within its own business, within its supply chains or through any other business relationship. This Policy also forms part of QMS Media's response to its obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**), which requires QMS Media to report annually on the steps which it takes to identify, and address, the risks of modern slavery in its operations and supply chains.

#### 3. WHAT IS MODERN SLAVERY

Modern slavery occurs in a wide range of industries and businesses across the world, including in Australia. Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine or deprive them of their freedom. Modern slavery may involve the exploitation of debt and the use of violence and/or threats of violence (psychological or physical), isolation, deprivation of liberty and the withholding of critical identification documents such as passports.

#### 4. QMS MEDIA'S RESPONSE TO MODERN SLAVERY

QMS Media does not use or condone, child or forced labour in any of its operations and works to ensure these practices are not present in its supply chain.

QMS Media abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

QMS Media requires all Suppliers to comply with the Modern Slavery Act and the QMS Media Ethical Sourcing Code of Conduct available at <https://www.qmsmedia.com/ethical-sourcing-code-of-conduct/>.

compliance. These include:

- a) conducting risk assessments of its supply chain to determine areas with the highest risk of Modern Slavery;
- b) engaging directly with selected key Suppliers to assess the risk of modern slavery within the Supplier and its supply chain;

- c) introducing anti-slavery obligations in all Supplier contracts to include compliance with the Modern Slavery Act; and
- d) provide training to employees with high purchasing responsibilities on signs that could indicate modern slavery practices, due diligence practices for engaging Suppliers, auditing existing Suppliers and what action an employee can take if they have a concern in relation to modern slavery.

## 5. NON-COMPLIANCE WITH THIS POLICY

Any breach of this Policy will be taken seriously and dealt with on a case by case basis.

A breach of this Policy by an employee may lead to disciplinary action in accordance with QMS Media's disciplinary process. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to QMS Media's disciplinary procedure.

QMS Media may choose to adopt a zero-tolerance stance and terminate its relationship with a Supplier, other individuals or third party working on behalf of QMS Media if they breach this Policy, or may decide to work with the Supplier, other individuals or third party so they become compliant with this Policy.

## 6. REPORTING CONCERNS OF MODERN SLAVERY

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported in accordance with QMS Media Whistleblower Policy available <https://www.qmsmedia.com/whistleblower-policy/>. Reports of unethical or unlawful conduct are responded in accordance with QMS Media's Whistleblower Policy.

## 7. COMMUNICATION

QMS Media makes this Policy available by:

- a) posting the Policy on the QMS Media intranet or other communication platform;
- b) posting the Policy on the QMS Media website at [www.qmsmedia.com](http://www.qmsmedia.com);
- c) incorporating the Policy in employee induction and onboarding information packs and training for new starters.

QMS Media communicates this Policy to employees and officers annually.

## 8. KEY CONTACTS

If any part of this Policy is unclear please contact the QMS Media Company Secretary or legal department.

## 9. POLICY REVIEW AND AMENDMENT

This Policy is approved by QMS Media's CEO and will be revised from time to time in accordance with any legislative or organisational changes. Any amendments to this Policy shall be effected by the posting of an updated version of the document on QMS Media's intranet and website.

## 10. VERSION CONTROL

VERSION	DATE	AUTHOR	CHANGES
1.0	15 March 2022	Legal	First version of Policy
1.1	18 September 2023	Marketing	Rebranding policy