QMS MEDIA GROUP

MODERN SLAVERY STATEMENT 2020

This statement has been approved by the executive team and the QMS Media Group board of directors

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INTRODUCTION

This statement has been developed in accordance with the Australian *Modern Slavery Act 2018* (Cth) and the United Kingdom's *Modern Slavery Act 2015* (**the Acts**) and is issued on behalf of QMS Media Pty Limited (ACN 603 037 341) and its related body corporates[1] listed in Schedule 1 (referred collectively as the **QMS Media Group**). This statement outlines the steps taken by the QMS Media Group to identify, assess and reduce the risk of modern slavery practices within its operations or its supply chains during the year ending 31 December 2020.

The QMS Media Group is committed to conducting its business in a moral and ethical way and recognises the need to establish and maintain corporate governance policies and business practices which reflect and comply with relevant legal and regulatory framework. In support of this commitment QMS Media will continuously improve its approach to addressing modern slavery risks, including implementing and enforcing effective systems and controls.

STRUCTURE AND OPERATIONS

Structure

QMS Media is a large proprietary company incorporated in Australia and has its registered office in Melbourne, Victoria. QMS Media has subsidiaries in Australia, New Zealand, United Kingdom, USA, Brazil, Germany and Singapore. As at 31 December 2020, QMS Media Group employed approximately 422 employees globally.

Direct operations

The QMS Media Group are leaders in premium outdoor advertising, with a strategic focus in providing clients and agencies with dynamic and innovative advertising solutions, underpinned by the latest developments in technology and data. The QMS Media Group provides multi-platform engagement across its portfolio of premium landmark digital and traditional billboards, exclusive street furniture and airport opportunities across Australia. The QMS Media Group includes production and print, digital sporting marketing and media production across Australia and throughout the Americas, Europe and Asia.

Supply chains

The QMS Media Group largest categories of supplier spending globally relate to the following key categories:

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[1] TLA Worldwide (Aust) Pty Ltd has prepared a separate Modern Slavery Statement for the operations of that group of companies.

1. goods and services (including digital LED screens) needed to construct, install, operate and maintain out of home and sporting advertising infrastructure;

2. goods and services needed to produce and deliver advertising material including paper, ink, printing services, equipment;

3. services needed for the everyday operations, including recruitment, legal and tax, auditing, information technology, telecommunications and cleaning; and

4. software licences.

The majority of the QMS Media Group's suppliers are located in Australia however some products and services are sourced from international suppliers based in regions such as UK, the Americas and China.

RISKS OF MODERN SLAVERY PRACTICES

Direct operations

Given the industry in which the QMS Media Group operates and the locations of offices in low-risk jurisdictions (Australia, UK, USA, Germany and Chilie) QMS Media has assessed the risk of modern slavery practices within the QMS Media Group's direct business operations as low.

QMS Media has appropriate workplace management policies and practices, along with skilled managers, to ensure appropriate recruitment and management of employees, including compliance with minimum remuneration requirements.

Supply chains

QMS Media has reviewed the risk of modern slavery practices across its supply chains with close consideration of the *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities* document (**Guidance Document**).

In assessing the inherent risk of modern slavery in its supply chain, QMS Media also had regard to the most recent Global Slavery Index[2] which rates the countries in the regions that QMS Media directly deals with (as set our above) as low for prevalence of modern slavery practices.

The Global Slavery Index also lists Australia's top five imported product group at risk of being produced utilizing modern day slavery. Of the products identified the QMS Media Group purchases only one product group being laptops, computers and mobile phones via domestic suppliers who in some cases may import from overseas. Based on this initial assessment, QMS Media Group's direct global suppliers are based in countries where there are reasonable standards of protection for individual rights and there is not significant workforce of vulnerable populations.

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[2] https://www.globalslaveryindex.org/

However, as the QMS Media Group business expands, we are mindful of the increased risks relating to modern slavery associated particularly in the QMS Media Group's extended supply chain and higher risk categories or locations.

The Guidance Document assisted QMS Media to identify the following procurement categories as having a higher risk of modern slavery:

1.   electronic equipment purchased from Australian vendors with supply chains extending to high risk geographies; and

2.   products manufactured offshore from high risk categories including personal protective equipment, stationary, promotional products.

ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

QMS Media's commitment to identifying and eradicating modern slavery in its operations and supply chains is reflected in a number of policies, processes and practices implemented across the QMS Media Group as at 31 December 2020.

Goods and services suppliers

The QMS Media Group generally obtains goods and services from suppliers known to be reputable, substantial commercial entities. QMS Media has often dealt with those suppliers over many years, which provides QMS Media with a high level of confidence in the quality of their operations.

QMS Media Group personnel

The QMS Media Group has human resources, finance, legal, procurement and internal audit teams whose roles include ensuring compliance with laws and internal policies and processes across the businesses.

QMS Media Code of Conduct and other policies

o   The QMS Media Code of Conduct (**Code**) applies to all QMS Media Group personnel, including employees, contractors, managers and directors.

o   The Code outlines standards, practices and behaviors necessary to maintain confidence in the integrity of the QMS Media Group and makes clear the behaviours expected of all QMS Media Group personnel to strengthen the internal culture of the business. This includes behaving ethically and complying with the law.

o   The QMS Media Group has other policies to help guide the behaviours of its personnel, including Diversity Policy. All policies are available on the QMS Media intranet.

Whistleblower Policy

o   The QMS Media Group has adopted a Whistlebower Policy, which provides QMS Media Group personnel (as well as relatives of those persons) with assurance that if they disclose wrongdoings they can do so safely, securely and with confidence that they will be protected and supported.

o   QMS Media has appointed an external Australian based supplier to receive reports made under QMS Media's Whistleblower Policy, to provide an independent avenue for concerns to be raised.

This facility is available to the QMS Media Group's suppliers as well as employees (past and present).

Recruitment and terms of employment contracts

o   The majority of recruitment for the QMS Media Group is conducted by personnel located in Melbourne, Australia. QMS Media is therefore able to ensure that the process is conducted in an ethical and transparent manner and employment contracts contain fair and just terms in relation to wages, working hours and other working conditions.

o   This recruitment oversight aids in curbing any direct instances of modern slavery practices within the QMS Media Group's operations.

o   All new employees are given a copy of relevant QMS Media's policies as part of their induction. QMS Media requires all new employees to acknowledge they have received and agree to abide by the relevant QMS Media policies.

ISO certification

QMS Media maintains a Workplace Health and Safety Management System and the following certifications:

o   ISO 9001:2015 Quality management systems;

o   ISO 45001: 2018 Occupational health and safety management system

o   AS 4801:2001 Occupational health and safety management system

o   ISO 15001:2015 Environmental Management System

Material agreement sign off

The QMS Media Group requires any material agreement to be signed off from senior management of QMS Media. This approval includes consideration of risks relating to entering into an agreement with a supplier, which could include the identity, location or operations of the counterparty.

ASSESSMENT OF EFFECTIVENESS

QMS Media understands that modern slavery risk is continually evolving and will remain vigilant to slavery and human trafficking in its supply chains. As part of QMS Media's commitment to identify and eradicate modern slavery practices in its operations and supply chains the following additional actions have either commenced or are planned and will be reported on in subsequent statements.

New supplier assurance questionnaires

Two new supplier assurance questionnaires have been developed based on the supplier risk profile categorisation. The questionnaires will be given to new suppliers to complete and will assist the QMS Media Group to identify and assess the risk of modern slavery practices occurring in its supply chains.

New supplier categorisation matrix

o   A new supplier categorisation matrix is used to extend the QMS Media Group's risk profiling by categorising a supplier's risk levels based on territory, product type or service.

o   The determined profile will dictate which questionnaire is to be provided to the new supplier for completion and what supporting documentation is required.

Modern slavery clauses in contracts

QMS Media is preparing to undertake an audit of its current supplier agreements and to include in any new agreement with suppliers (where possible) representations and obligations in relation to the supplier's commitment to preventing modern slavery practices, the ability of the supplier to comply with the Acts and to cooperate with QMS Media by providing information required to assess modern slavery risks in their operations and supply chains. These provisions have been incorporated in the City of Sydney project civil works subcontract.

Modern Slavery Policy

A Modern Slavery Policy will be implemented across the QMS Media Group. The policy will solidify the QMS Media Group's commitment to identifying and addressing risks of modern slavery occurring in its supply chains and set out the standards of behavior expected of the QMS Media Group personnel in identifying and addressing modern slavery risks.

Code of conduct and other policies

o   QMS Media will amend its employee Code of Conduct to ensure that staff practice ethical business standards and take steps such as conducting due diligence checks with respect to prospective suppliers and report any unlawful practices such as forced labour or slavery/slavery like practices observed in QMS Media's supply chains.

o   An Anti-Bribery and Corruption Policy will be implemented across the QMS Media Group. The policy will be added to the QMS Media Group's suite of policies that guide behaviour of its personnel.

Integrated Management System

QMS Media intends to implement an integrated management system that will act as an efficient mechanism to analyze and monitor suppliers in relation to particular areas of the business.

Supplier Code of Conduct

QMS Media is implementing a Supplier Code of Conduct – Ethical Sourcing. Where a supplier seeks to use its own supplier code of conduct, QMS Media is implementing a code of conduct evaluation tool to assess if the supplier's code of conduct compliance level meets QMS Media's minimum conduct requirements.

Environmental, Social and Governance (ESG) reporting

QMS Media is implementing two ESG reporting templates for the areas of media, print and production and sport. The ESG reports will be reported to the QMS Media board on a quarterly basis.

Employee training

QMS Media intends to enhance training and awareness specific to modern slavery to all staff specifically involved in managing the supply chain. Once implemented, QMS Media will include its Modern Day Slavery Policy in its suite of policies provided as part of new employee induction and ongoing employee training.

COVID 19

The QMS Media Group acknowledges that COVID-19 may have an impact on modern slavery risks within the QMS Media Group's supply chains. We will strive to ensure that any COVID-19 related modern slavery risks are identified and addressed accordingly.

CONSULTATION

The QMS Media Group operates under broadly common policies across the out of home media sector. As such, it is appropriate to provide a single statement for the QMS Media Group. As the ultimate holding company of the QMS Media Group, QMS Media has the required knowledge of the group's operations to prepare this statement. Staff involved in the preparation of this statement have consulted with the necessary business operations of the QMS Media Group to gather the necessary information to prepare this statement on behalf of the QMS Media Group.

APPROVAL

This statement was approved by the Board of Directors of QMS Media Pty Limited as the parent company of the QMS Media Group, on 26 May 2021.

Barclay Nettlefold

CEO

QMS Media Pty Limited

31 May 2021

SCHEDULE 1

AUSTRALIAN COMPANIES
Australian Billboard Company Pty Ltd
BMG Australasia Pty Ltd
Digital Commons Australia Pty Ltd
Digital Outdoor Media (Aust) Pty Ltd
Digital Outdoor Media (NSW) Pty Ltd
Digital Outdoor Media (QLD) Pty Ltd
Digital Outdoor Media (VIC) Pty Ltd
Digital Outdoor Media (WA) Pty Ltd
Elwood Outdoor Advertising Pty Ltd
Gomeeki Operations Pty Ltd
Live Docklands Pty Ltd
MMT Land Pty Ltd
MMTB Pty Ltd
Octopus Property Pty Ltd
Omnigraphics Australia Pty Ltd
Paramount Outdoor Pty Ltd
Plexity Holdings Pty Ltd
Q Media Pty Ltd
QMS Australian Holdings Pty Ltd
QMS Australia Pty Ltd
QMS Rail Media Pty Ltd
QMS Sport Pty Ltd

QMS Sport Holdings Pty Limited
QMS Sport (Europe) Holdings Pty Ltd
QMS Sport (US) Holdings Pty Ltd
Riverview Signage Pty Ltd
Riverview Signage Trust
Rpple Media Pty Ltd
Skyline Digital Pty Ltd
Sportsmate Technologies Pty Ltd
Standout Media Pty Ltd
The Digital Outdoor Group Pty Ltd
TLA Worldwide (Aust) Pty Ltd
TLA Merchandise Pty Ltd
Stride Sports Management Holdings Pty Ltd (Strike off action in progress)
World Sports & Entertainment Holdings Pty Ltd
World Sports & Entertainment Technologies Pty Ltd

INTERNATIONAL COMPANIES
PT Insite Media (Indonesia)
QMS Insite Media Pte Ltd (Singapore)
Stella Vista International Limited (UK)
TGI Systems Corporation (Illinosis)
TGI Brasil Esportes e Entretenimento Ltda (Brazil)
TGI Europe Gmbh (Germany)