



**QMS Media Pty Limited**

**MODERN SLAVERY STATEMENT**

**2021**

# QMS Media Pty Limited

## Modern Slavery Statement 2021

### INTRODUCTION

This statement has been developed in accordance with the Australian Modern Slavery Act 2018 (Cth) (**the Act**) and is issued on behalf of QMS Media Pty Limited (ACN 603 037 341) and its related body corporates 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 calendar year ending 31 December 2021.

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 with its registered office in Melbourne, Victoria which operates across Australia with primary operations in Melbourne, Sydney, Brisbane, The Gold Coast and Perth. On 30 April 2021 the QMS Media Group completed a demerger of QMS Sport Holdings and its subsidiaries. As at 31 December 2021, the QMS Media Group employed approximately 214 employees.

QMS Media owns PT Insite Media, which manages a network of outdoor advertising assets across Indonesia. Other QMS Media investments included a 40% interest in Mediaworks Investments Limited, New Zealand.

#### 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 static billboards, exclusive street furniture and airport opportunities across Australia. The QMS Media Group also includes print production operations across Australia

#### Supply chains

The QMS Media Group largest categories of supplier spending relate to the following key product and services categories:

1. goods and services (including digital LED screens) needed to construct, install, operate and maintain out of home advertising infrastructure
2. goods and services needed to produce and deliver advertising material including paper, ink, printing services, equipment;
3. services needed for everyday business 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 who have operations in regions such as the Americas, Hong Kong 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 Australia, 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 and executives, to ensure appropriate recruitment and management of employees is maintained, 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*.

In assessing the inherent risk of modern slavery in its supply chain, QMS Media also had regard to the most recent Global Slavery Index<sup>1</sup> which rates the countries in the regions that the QMS Media Group directly deals with (as set out 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.

On the basis of this assessment, we believe the risk of modern slavery in our supply chains is considered low. While most of the QMS Media Group's direct supply chain expenditure is located in Australia, some goods and sources are sourced from global suppliers. The QMS Media Group generally deals with Australian based subsidiaries of these international suppliers and acknowledges that these suppliers may have a wider supply chain involving other jurisdictions which QMS Media does not have oversight. In these instances, QMS Media acknowledges suppliers engaged in Australia could purchase equipment manufactured overseas in areas that might be of risk of modern slavery practices. However, this is mitigated by the QMS Media Group's major supplier agreements containing obligations of compliance with modern slavery laws and engaging reputable global suppliers that are based in countries where there are reasonable standards of protection for individual rights and there is not significant workforce of vulnerable populations.

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.

---

<sup>1</sup> <https://www.globallslaveryindex.org/>

## **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 2021.

### **Goods and services suppliers**

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

### **QMS Media Group personnel**

The QMS Media Group has people and culture, 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 Business Conduct and other policies**

- The QMS Media Code of Business Conduct applies to all QMS Media Group personnel, including employees, contractors, managers and directors.
- The Code of Business Conduct 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.
- The QMS Media Group has other policies and codes to help guide the behaviours of its personnel, including a Diversity Policy and Ethical Sourcing Code of Conduct. All policies and codes are available to employees on the QMS Media intranet and all policies relevant to external parties available on the QMS Media website.

### **Recruitment**

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

- ISO 9001:2015 Quality management systems;
- ISO 45001: 2018 Occupational health and safety management system
- AS 4801:2001 Occupational health and safety management system
- 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 – City of Sydney project**

QMS Media has two supplier assurance questionnaires (**Assurance Questionnaires**) that may be given to new suppliers for the City of Sydney project based on the supplier risk profile categorisation. The Assurance Questionnaires are given to new suppliers to the City of Sydney project to complete and assist the QMS Media Group to identify and assess the risk of modern slavery practices occurring in its supply chains.

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

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

### **Modern slavery supplier questionnaire**

QMS Media is not practically able to observe the entirety of suppliers' operations. As part of our supply chain due diligence, we intend to develop and distribute a modern slavery supplier questionnaire (**Modern Slavery Questionnaire**) to all existing and new major suppliers (and others we consider operate in high risk areas) to gather information about our suppliers' operations, supply chains and modern slavery standards. QMS Media may take additional steps based on a supplier's response to our Questionnaire or an assessment of the products and services provided by a supplier.

### **Modern Slavery Policy**

A Modern Slavery Policy has been implemented across the QMS Media Group. The policy solidifies 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 Business Conduct and other policies**

QMS Media has amended its employee Code of Business 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.

QMS Media will continue to regularly review our Code of Business Conduct and other policies to ensure they remain up to date and effective in assessing modern slavery risks.

## **Integrated Management System**

QMS Media's City of Sydney project has an integrated management system that acts as an efficient mechanism to analyze and monitor suppliers in relation to particular areas of the business.

## **Ethical Sourcing Code of Conduct**

QMS Media has implemented a supplier Ethical Sourcing Code of Conduct (**Supplier Code of Conduct**) which is publically available on the QMS Media website. Our Supplier Code of Conduct sets out QMS Media's expectations and the minimum standards of behaviour required of our suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts and health and safety. It also specifically addresses labour, human rights and modern slavery standards. In certain supply categories suppliers are required to confirm that they have read Supplier Code of Conduct – Ethical Sourcing and that the content is materially similar to their company's code of conduct.

## **Environmental, Social and Governance (ESG) reporting**

QMS Media uses an ESG reporting template to report to the QMS Media board on ESG business aspects on a quarterly basis.

## **Employee training and policy compliance**

QMS Media intends to continue training and awareness specific to modern slavery to all staff specifically involved in managing the supply chain. QMS Media also intends to implement an employee periodic acknowledgement of their compliance with all relevant QMS Media policies.

## **CONSULTATION**

The QMS Media Group operates under broadly common policies and operational protocols having its key activities within the out of home media sector and reporting to an intergrated leadership team and the QMS Media Board. 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 22 June 2022.

A handwritten signature in black ink, appearing to read 'John O'Neill', with a stylized flourish at the end.

John O'Neill CEO

QMS Media Pty Limited

Date: 22 June 2022

## **SCHEDULE 1**

### **AUSTRALIAN COMPANIES**

Australian Billboard Company Pty Ltd

BMG Australasia 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

### **INTERNATIONAL COMPANIES**

PT Insite Media (Indonesia)

QMS Insite Media Pte Ltd (Singapore)