

JCDecaux

MODERN
SLAVERY
STATEMENT 2025



INTRODUCTION

For more than 60 years, JCDecaux has been the global leader and innovator of Out-of-Home advertising, having first invented the concept of advertiser funded street furniture in Lyon, France.

As the world's number one Out-of-Home advertising group, JCDecaux has more than 1 million advertising panels reaching more than 850 million people worldwide everyday in over 80 countries.

JCDecaux is passionate about enhancing the cities and environments in which we operate. With a commitment to integrity and excellence in service, JCDecaux is driven by innovation and beautiful design. We aim to do this in the most environmentally sustainable and socially responsible manner, working with our partners, clients and communities to enhance environments and the cities in which we operate, while delivering advertising structures which have thoughtful amenity, innovation and beautiful design.

Across JCDecaux's global operations and supply chains, we have an uncompromised commitment to human and labour rights, the continuous protection of our environment, and unwavering business integrity.

This commitment includes the eradication of modern slavery in its many forms, such as forced or child labour. We endeavour to minimise risk, and to identify and address these practices should they occur, through robust due diligence and risk management processes, and a culture that encourages people to speak up when they see or feel something is not right.





Tax & Duty Free  Heineken

THE QUELWET

JCDecaux AIRPORT

AUSTRALIAN BORDER FORCE

STRUCTURE & OPERATIONS



JCDecaux Australia Holdings Pty Ltd
ABN 50 627 855 323 (**JCDecaux**) is the holding company of the JCDecaux Australia and New Zealand corporate group (**the Group**). This Statement is a joint statement submitted on behalf of the following Group companies, each of which is a reporting entity for the purpose of the Modern Slavery Act:

JCDecaux Australia Holdings Pty Ltd
ABN 50 627 855 323

JCDecaux ANZ Pty Ltd (ABN: 26 627 855 663)

APN Outdoor Group Pty Ltd (ABN:57 155 848 589)

JCDecaux Australia Trading Pty Ltd
(ABN: 49 059 604 278)

All companies in the Group are ultimately owned 100% by JCDecaux.* Group companies other than the reporting entities referred to above are not reporting entities for the purpose of the Modern Slavery Act. This statement however covers the operations and supply chains of all companies in the Group, for the reasons set out below.

JCDecaux is ultimately owned (100%) by JCDecaux SE incorporated in France.

In Australia and New Zealand, the main operations of JCDecaux and its controlled entities involve the provision of Out-of-Home advertising,

including print, production, installation and maintenance of Out-of-Home advertising assets. This includes the supply of advertising and non-advertising street furniture such as bus / tram shelters and public telephones. JCDecaux also supplies and operates large format advertising panels and bus advertising. We operate over 40,000 advertising panels across Airport, Street Furniture, Roadside, Transit and Rail environments in Australia and New Zealand. Via its wholly-owned subsidiary, GSP Print Pty Limited, JCDecaux offers static printing and production services to the Out-of-Home advertising industry. JCDecaux has eight offices nationally across five capital cities, in addition to our New Zealand office in Auckland, employing just under 500 staff members across the Group.

*JCDecaux Australia Holdings Pty Ltd Group has non-controlling interests in several industry-controlled entities in Australia & New Zealand which are operated for the advancement of the out-of-home media industry generally in those countries. These industry entities are not considered part of the JCDecaux group for the purpose of this Statement and are not covered by the Statement.



The Australia & New Zealand Group is managed as one business with a common Executive Leadership Team. There are common statutory directors plus local directors across all group entities in Australia, and New Zealand, respectively. Back-office sales and operational systems are primarily aligned across all the entities.

Advertising campaigns are sold across networks comprising advertising rights held in multiple group entities. The Group operates under universal policies, procedures and management systems. Suppliers and supply chains are common

across the various trading entities in the Group.

For these reasons, JCDecaux believes it is appropriate to submit one Modern Slavery Statement covering all the entities in the Group. Where certain Group entities have different operations, for example the GSP Print business, the modern slavery implications of that business have been specifically considered, as identified on pages 9 to 17 below, and internal consultation with relevant managers of these divisions has been undertaken.

NEW ZEALAND

The following two New Zealand companies are 100% owned and controlled by JCDecaux:

JCDecaux New Zealand Holdings Limited NZBN: 94 290 3077 1048

JCDecaux New Zealand Trading Limited NZBN: 94 290 3822 1392

As part of the Group, the operations and supply chains of the New Zealand companies have been considered for the purpose of this statement. For the reasons set out above, the modern slavery actions and mitigations set out in this statement are applicable to JCDecaux's New Zealand companies.

SUPPLY CHAIN



JCDecaux has re-assessed its supply chains relevant to the 2025 calendar year. Our supply chains have not changed materially from the previous year.

JCDecaux's Australian & New Zealand supply chains include:

- Suppliers of components to build and maintain advertising assets and panels. JCDecaux acquires digital screens and electronic components from both local and international suppliers to construct and maintain digital advertising panels. Specific to advertising assets and panels, we engage **service suppliers** including engineering consultants, asset installers, civil and electrical contractors, advertising installation services, and contracted cleaners.
- Suppliers of components to build and maintain **Street Furniture** such as bus shelters, benches, and public phonebooths.
- Suppliers of **substrates (materials) and printing equipment** for printed advertising on non-digital advertising assets.
- **Suppliers of IT infrastructure, software and IT equipment.**

- **General product suppliers** for office equipment, consumables and clothing.
- **General services suppliers** including telecommunication services, freight including shipping, consultancy (marketing, legal and external consultancy), photography, office cleaners, fleet management services, waste management services and travel providers.

Our suppliers are predominantly domiciled in Australia, with international suppliers located in the United States, China, Taiwan, New Zealand, Singapore, France and Germany. International suppliers are used for the procurement of some electronic screens and their components, printing materials, street furniture and software.



JCDecaux

**THE
REWARD
FOR
RUNNING
IS MORE
RUNNING.**



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IS MORE RUNNING.**



RISK ANALYSIS

JCDecaux has reviewed and assessed the risk of potential modern slavery practices in both its business operations and supply chains.



BUSINESS OPERATIONS

JCDecaux assesses the risk of modern slavery practices in its direct business operations as low. Firstly, with respect to the entities covered by this report, JCDecaux only conducts business in Australia and New Zealand, countries which represent a low prevalence of modern slavery.¹ Secondly, Advertising and Media are not industries generally recognised as high risk for modern slavery.²

JCDecaux's operations are carried out by skilled, professional employees who are required to have high levels of education, training and accreditation. The complex and skilled nature of JCDecaux's business means modern slavery risks to its employees are extremely low. JCDecaux complies with all relevant employment and industrial relations laws in Australia and New Zealand and has highly developed human resources processes in place to facilitate this.

We have a highly skilled People and Culture function who keep up to-date with the relevant local and national legislation, educate leaders across the business on what is required to comply with legislative changes and monitor ongoing compliance levels.

SUPPLY CHAINS: AUSTRALIA & NEW ZEALAND

CONSTRUCTION, MAINTENANCE AND POSTING OF ADVERTISING

JCDecaux outsources certain parts of the operational side of its business in Australia and New Zealand, including construction and maintenance of advertising assets and street furniture, and posting and removal of physical (non-digital) advertising. These services are provided by suppliers who range from accredited professionals, such as engineers to construction and maintenance companies engaging skilled workers. In light of the geographic factor referred to above, JCDecaux believes that any risk of modern slavery practices occurring in these direct service providers is low.

CLEANING

JCDecaux engages some cleaning services for the offices and warehouses it maintains. We note that the cleaning industry is regarded as a potential risk industry for modern slavery.³ Given the strength of industrial laws and regulation generally in Australia and New Zealand, JCDecaux regards the risk in this area as low.

WORK CLOTHES

We note that clothing manufacture is regarded as an at risk industry for modern slavery.⁴ JCDecaux has a limited number of field staff required to wear work clothing which identifies them as JCDecaux employees and makes available the work clothing to its other staff, who may wear the work clothing on a voluntary basis in the course of their role. These uniforms are sourced by procurement within JCDecaux through Australian suppliers.

WASTE MANAGEMENT SERVICES

The waste industry is regarded as an at-risk industry for modern slavery. JCDecaux engages the services of third-party waste management services suppliers to address its general waste and recycling needs. These suppliers are categorised as “key suppliers” and evaluated yearly to assess their compliance to our Supplier Code of Conduct. Based on our evaluation, we assess the risk of modern slavery as low.

SUPPLY CHAINS: INTERNATIONAL

In addition to service providers who directly support our business in Australia and New Zealand, JCDecaux sources certain products from outside those two countries. We have assessed that, given the nature of the industry concerned, and the countries of origin, certain products may pose some risk of modern slavery occurring in their manufacturing supply chains. This stems from the risk that either local laws do not provide

a similar level of protection for workers as in Australia and New Zealand, or suppliers do not comply with local laws or respect human rights appropriately in their direct employment and contracting arrangements or activities. We also consider the risk of lack of transparency or visibility in a supply chain of second and third tier suppliers, where for example, components sourced by suppliers from third parties for manufacturing of products may involve modern slavery practices, or there may be modern slavery practices in the production of raw materials used to make those components.

DIGITAL SCREENS, COMPONENTS FOR SCREENS AND RELATED ADVERTISING ASSETS

The manufacture of electronic products is considered an at-risk sector.⁵ These products are sourced from France, the United States, China, South Korea and Taiwan. These countries represent a low to moderate prevalence of modern slavery.⁶

SUBSTRATES, PRINT MACHINERY AND PRINTING SUPPLIES

Through the GSP Print arm of the business, printing equipment and stock are sourced from countries including Singapore, China and Germany. These countries represent a low to moderate prevalence of modern slavery.⁷

LAPTOPS AND RELATED INFORMATION TECHNOLOGY EQUIPMENT

With just under 500 employees across Australia and New Zealand, personal technology and communications equipment are sourced for employee use. As noted above, these products represent a sector which is prone to modern slavery risks.⁸

1. The Global Slavery Index 2023 ('GSI'): <https://www.walkfree.org/global-slavery-index/map/>
2. The Global Slavery Index 2023 ('GSI'): <https://www.walkfree.org/global-slavery-index/map/#mode=data:dimension=> Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities, Dept of Home Affairs ('Guidance') page 44.
3. Guidance page 44.
4. Refer footnote 3 above.
5. Refer footnote 3 above.
6. Refer footnote 1 above.
7. Refer footnote 1 above.
8. Refer footnote 3 above.

SAMSUNG

Galaxy Z Fold7
Galaxy AI

JCDecaux

Grill'd
HEALTHY
BURGERS

PUZZLE
COFFEE

PUZZLE

ADDRESSING MODERN SLAVERY RISKS

JCDecaux is committed to fostering a high level of integrity and it has the advantage of being part of an international corporate group, with significant resources and experience developed over time at the international level.

Responsible growth and sustainable development are some of the Group's core values⁹ which drive quality and risk management in our operations and supply chain. Fundamental to that objective are the Group's four core Charters¹⁰:

- The JCDecaux Group Code of Ethics
- The JCDecaux International Charter of Fundamental Social Values
- The JCDecaux Code of Conduct of Suppliers
- The JCDecaux 2030 ESG Strategy

These documents enshrine JCDecaux's corporate principles on ethical and social responsibility, as well as supplier conduct and expectations. They apply to all subsidiaries, including the Australia and New Zealand business. The Charters include matters of social and corporate responsibility which cover the risks posed by modern slavery.

The specific application of the Charters to JCDecaux's supply chain is detailed below, however it is relevant to note that all employees of JCDecaux are required,

on commencing employment, to agree to the Group Code of Ethics, with respect to their conduct as employees of the Group. Amongst other things, the Code of Ethics sets out expectations as to how employees should engage with suppliers, including acting at all times with integrity and implementing the Group Supplier Code of Conduct.

Being headquartered in France, JCDecaux's French parent company, JCDecaux SE, is subject to the French anti-corruption and anti-bribery laws known as "SAPIN II". We have implemented compliance with these laws locally, including by introducing compliant Australian and New Zealand whistleblowing and conflict of interest policies. We believe that a strong whistleblowing process supports modern slavery mitigation, as it provides a safe pathway for reporting non-compliance within the business, including in areas of modern slavery.

Over the past few years, JCDecaux SE strengthened its compliance function by appointing its first Compliance Director for the international group, as well as local "Compliance Referents" for

each subsidiary or region. The ANZ General Counsel is the Compliance Referent for Australia and New Zealand. Off the back of this, the Group implemented a number of ESG, anti-corruption and compliance initiatives which continued into 2025.

This includes the introduction of a JCDecaux Group Client Charter, directed towards JCDecaux's advertising clients. It sets out to clients the principles of social responsibility which JCDecaux stands for, as recorded in the core Charters referred to above. As part of the implementation of the Client Charter, all clients who represent 1% or more of JCDecaux's total advertising revenue, including at the local Australia and New Zealand level, were assessed to ensure alignment with JCDecaux's social values, including those relating to forced labour, child labour, and universal human rights.

Additionally other actions JCDecaux has taken in the past few years include:

- implementing a new online Group Whistleblowing platform "Whispli" to streamline notification and management of whistleblowing disclosures

- implementing the JCDecaux Group internal Policy on Conflicts of Interest
- implementing the JCDecaux Group internal procedure relating to Sponsorship & Patronage Operations
- expanding the local Australia and New Zealand Workplace Conduct Policy to include specific anti-corruption provisions
- implementing a local Australia and New Zealand Gifts, Invitations and Other Benefits Policy

While not all of these initiatives directly impacted modern slavery mitigation, they form part of JCDecaux's ongoing efforts to implement and maintain the highest standards of ethical compliance in our organisation.

MITIGATION ACTIONS

Since 2023, JCDecaux has maintained a dedicated Environmental, Social and Governance (ESG) function. The Head of ESG oversees smaller, functional-focused working groups which is comprised of members from different parts of the organisation, including Operations, Sales, Asset Development and Commercial. The working group's remit covers all

aspects of ESG for the Australia and New Zealand business, including matters relating to procurement and Modern Slavery.

As set out on pages 9 and 10, we have identified that our supply chain, and in particular certain procurement requirements and sources, pose a risk from a modern slavery perspective. One of our primary focusses therefore is to work with our key suppliers to mitigate risk, including modern slavery risk. This occurs at various levels.

CODE OF CONDUCT, SCREENING, AND FOCUS ON SUPPLIER ACTIONS

At the international level, JCDecaux SE has a global Purchasing Policy which is based on responsible and sustainable purchasing practices. JCDecaux in Australia and New Zealand has implemented this at the local level. One of the key requirements for new suppliers is that they are provided with, and agree to conduct themselves in accordance with, the principles in JCDecaux's Supplier Code of Conduct. JCDecaux's Supplier Code of Conduct addresses modern slavery risks in relation to suppliers' employment and labour practices. It mandates compliance with the International Labour Organization's eight

Fundamental Conventions, including in particular:

- Prohibition of forced labour (ILO Conventions No. 29 and No. 105)
- Prohibition of child labour (ILO Convention No. 138)
- Working hours (ILO Convention No. 30)

The Supplier Code of Conduct also addresses suppliers' practices in relation to ethical behaviour, work health and safety, and environmental compliance. JCDecaux's assessment process for new suppliers involves due diligence on the supplier's practices in these areas, and also on a range of legal compliance and quality factors.

In most cases, suppliers will sign and agree to JCDecaux's Supplier Code of Conduct but in some cases, suppliers have their own Code of Ethics or Code of Conduct, encompassing values aligned to JCDecaux's Charters. In that event, JCDecaux may conduct an assessment of the Supplier's Code, comparing it against the requirements of JCDecaux's Supplier Code of Conduct. This is done using a pre-determined assessment matrix, with Suppliers' codes requiring 90% compliance with JCDecaux's Code of Conduct in order to be acceptable.



In particular, JCDecaux puts a focus on its “Key Suppliers”. A “Key Supplier” for JCDecaux is not defined solely by reference to annual spend or business criticality, but by taking into account at-risk sectors, including printers, providers of work clothes, providers of composite material, and providers of digital screen technology for outdoor advertising.

All suppliers are categorised according to a strict evaluation process which takes into account the nature of the supplier’s business, the supplier’s performance during previous evaluations, and volume of business with JCDecaux.

The supplier classification assesses the degree of risk from a supplier’s performance. The factors include their past performance in Quality, Environment, Health and Safety,

their annual spend with JCDecaux in the past 3 years, their geographical location, and social responsibility. Under the evaluation system, a risk assessment questionnaire has been developed for use at the onboarding stage. The questionnaire includes questions specifically addressing a supplier’s awareness of modern slavery practices, as well as seeking information on the supplier’s position on modern slavery, and any mitigation actions which they have put in place.

By assessing suppliers against a broad range of criteria, of which price is only one factor, JCDecaux is seeking to maximise the engagement of quality suppliers who are committed to appropriate standards of commercial behaviour, commensurate with our own

expectations. This in turn minimises the risk of unlawful or unethical behaviours, including in relation to modern slavery practices.

BUSINESS OPERATIONS

While JCDecaux assesses the risk of modern slavery practices in its direct business operations as low, JCDecaux continues to mitigate its risks by undertaking an annual remuneration review for its employees. This review includes assessing the employee’s wage against the national minimum wage according to employment type, age and work capacity to ensure we are compliant. Further, at the start of an employee’s employment, JCDecaux verifies all new employees’ right to work in Australia or New Zealand, as applicable. Where an individual’s right to work is based on a visa, JCDecaux periodically tracks

and verifies the visa status using a third party provider to ensure that their employment conditions align with their visa conditions.

In addition, JCDecaux has a minimal number of fixed term employment contracts and does not regularly use labor hire organisations to undertake work. In instances where JCDecaux uses independent contractors, JCDecaux pays those organisations or contractors an amount equal to or above market rate for the services provided.

9. <https://www.jcdecaux.com/sustainable-development/our-strategy>
10. <https://www.jcdecaux.com/sustainable-development/social-priorities>
<https://www.jcdecaux.com/our-ethic>



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RESIDENCES
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BEACH HOUSE STRATA PACIFIC

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NEPEAN HWY
Frankston

Fitzroy St

JCDecaux DIGITAL LARGE FORMAT

ASSESSING EFFECTIVENESS

JCDecaux actively monitors and reviews the effectiveness of its actions, primarily through the Procurement and Operations Business Units.

ONGOING ASSESSMENT OF SUPPLIERS

JCDecaux undertakes a range of ongoing monitoring and reassessment of our suppliers, including their compliance in relation to modern slavery risks. JCDecaux focuses on Key Suppliers who pose the greatest risk from both a business continuity and modern slavery perspective. The key suppliers include suppliers of screens and components for screens. From an ethical and social perspective, we also concentrate on manufacturers from higher risk geographical territories. In 2025, 100% of our Key Suppliers signed our Code of Conduct and were audited, using JCDecaux's process and questionnaire.

ANNUAL KEY SUPPLIER AUDIT

All Key Suppliers are audited at least annually. This includes an annual risk assessment questionnaire completed by each of the Key Suppliers, and may include onsite audits for high risk or high value suppliers, where that is reasonably practicable (detailed

below). In addition, supplier contracts are reviewed on a case by case basis as supplier contracts come up for extension or renewal. In 2024, JCDecaux expanded its annual risk assessment questionnaire by introducing questions specifically addressing the key supplier's modern slavery mitigation actions. This continued into 2025. The key supplier is asked if the supplier:

1. Is required to submit a Modern Slavery Statement under modern slavery legislation;
2. Has any policies or standards addressing its modern slavery risks and actions;
3. Has been involved in or convicted of any offences or breach of laws relating to labour or employment;
4. Undergoes regular training of its staff to identify and respond to modern slavery risks; and
5. Has investigated their supply chains for the purpose of identifying any modern slavery risks.

At the start of 2025 after reviewing the answers to the 2024 questionnaire supplied by our key suppliers, JCDecaux engaged with those key suppliers who did not have a Modern Slavery Statement or Policy. Each of those suppliers assessed during the 2024 questionnaire has now recognised the importance of combatting modern slavery and subsequently put in place a relevant Modern Slavery Statement or Policy.

In 2025, based on the criteria above, JCDecaux reassessed its list of key suppliers which included adding and removing some key suppliers. The 2025 key supplier questionnaire, which asked the same modern slavery questions, revealed:

- Approximately 35% of our key suppliers were not required to prepare or submit a Modern Slavery Statement under the relevant modern slavery legislation.
- Pleasingly, despite not being required to submit a statement, over 90% of

those suppliers had a policy or standard in place to combat modern slavery. Some of those suppliers implemented a policy or standard after our consultation in 2024. The suppliers who did not have a policy or statement in 2025 in place were new suppliers previously not identified as key suppliers in 2024.

- In addition, approximately 70% of those suppliers provided training to their staff and contractors to assist in identifying, addressing and responding to modern slavery. The suppliers also conducted an assessment or investigation into their suppliers to identify, prevent or reduce risks specific to modern slavery.

Further, our observations after completing the 2025 key supplier audit are:

- There is a general improvement towards each supplier's understanding and awareness of modern slavery, which included in some instances, a more detailed Modern Slavery Statement or Policy, or the implementation of training on identifying modern slavery

where there previously was no training in place.

- There is a growing willingness to actively combat modern slavery risks and for our suppliers to assess their own suppliers.

In 2026, JCDecaux will continue working with its suppliers to improve their modern slavery mitigation actions.

SUPPLIER SITE VISITS

In 2025, JCD representatives conducted in-person site visits, including to key substrate suppliers and digital screen suppliers based overseas. During those site visits, JCDecaux observed the supplier's work practices and took the opportunity to observe the measures put in place by those suppliers to mitigate modern slavery.

STAFF TRAINING

Finally, JCDecaux conducts training of key procurement staff to reinforce knowledge of appropriate purchasing behaviours and standards, of which all key procurement staff are up to date.

INTERNAL AUDIT

The JCDecaux headquarters in France regularly conducts internal audits of its subsidiaries' business activities. The Internal Audit function provides an extra layer of accountability to compliance and best practice across all areas of the business, including procurement and modern slavery.

CONSULTATION

As described above in this Statement (refer page 5), the entities in the Group operate as a wholistic business. Consultation with all areas of the business was achieved primarily via engagement with senior managers representing all relevant parts of the business, including Procurement, ESG, Legal and Government Relations.

APPROVAL

This statement is submitted jointly by JCDecaux Australia Holdings Pty Limited, JCDecaux ANZ Pty Ltd, APN Outdoor Group Pty Ltd and JCDecaux Australia Trading Pty Ltd as Reporting Entities. This statement was approved by the board of each Reporting Entity on 25 June, 2026.



Max Eburne
Co-Chief Executive Officer
and Director



David Watkins
Co-Chief Executive Officer
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JCDecaux

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