

# MODERN SLAVERY STATEMENT

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**AUGUST 2019**

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## Introduction

This statement sets out Enero Group Limited's (**Enero**) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2019-2020.

Enero recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are passionate about what we do and seek to inspire, and encourage, all whom we encounter. Enero prizes diversity of thought and human diversity in all its forms. We care about the world we live in as well as the results and outcomes that we achieve.

Enero is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of Enero and its subsidiaries.

Enero an international network of marketing and communications businesses with a workforce of over 600 with diverse skill sets working in 14 cities around the world including Sydney, Melbourne, San Francisco, New York, Houston, Minneapolis, Mexico City, London, Manchester, Madrid, Paris, Milan, Munich and Frankfurt. We also have affiliates in Singapore, Tokyo, Dubai, Amsterdam, Sao Paulo and other key markets. Most of our direct supply chain spend is in Australia, the United States and the European Union. The services we procure are predominantly provided in Australia, the United States and the European Union.

Enero and its subsidiaries have a varied range of business to business and business to consumer clients of all sizes, from small business to large enterprise and Government bodies. We bring innovative and intuitive products and services to market, and offer a broad suite of media, content and connectivity options in Australia, as well as connectivity and enterprise services globally. Most of our direct supply chain spend is in Australia, the United States and the European Union. The services we procure are predominantly provided in Australia, the United States and the European Union.

For more information about our business structure and strategy, please refer to our Annual Report available at [enero.com](http://enero.com). Enero is listed and our issued shares are quoted on the Australian Securities Exchange (ASX).

## *Countries of operation and supply*

Enero currently operates in the following countries: Australia, the United States, the United Kingdom, France, Germany, Italy, Spain and Mexico.

## *High-risk activities*

As an international business we have a diversified and workforce and contractor base. We have examined the human rights risks to identify what we consider to be key risk areas:

- Salaries
- Labour benefits
- Working hours
- Child labour
- Forced labour
- Freedom to associate
- Discrimination
- Bribery and corruption
- Occupational health and safety
- Privacy and data
- Access to grievance mechanisms

## *Responsibility*

Responsibility for Enero's anti-slavery initiatives is as follows:

- **Policies:** Enero Group Legal department and Enero Group People & Culture department.
- **Risk assessments:** Enero Group Legal is responsible for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** Enero Group Legal and Enero Group People & Culture departments are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** Enero Group Legal department and Enero Group People & Culture department will undertake training in the calendar year 2019 to identify slavery and human trafficking risks.

## **Relevant policies**

We have a wide range of policies relating to modern slavery which we have embedded in our various businesses. These make it clear what behaviour is expected of our employees in respect of modern slavery.

We also have the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

## **Policies**

**Whistleblowing policy** Enero encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Enero. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Enero's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns should refer to their local Whistleblowing Policy or, if there is one for their jurisdiction, contact the Enero Group General Counsel.

**Employee code of conduct** ([https://www.enero.com/images/enero/policies-and-charters/Code\\_of\\_Conduct.pdf](https://www.enero.com/images/enero/policies-and-charters/Code_of_Conduct.pdf)) Enero's code makes clear to employees the actions and behaviour expected of them when representing Enero. Enero strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

## **Due diligence**

Enero undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Enero's due diligence and reviews are implemented on a case by case basis and include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- conducting a general human rights or labour rights assessment of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- where general risks are identified, conducting supplier audits or assessments;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- using ethical supplier databases where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Training

Enero intends, in calendar year 2019, to implement employee training on modern slavery as a module within Enero's wider ethics training.

Enero's modern slavery training will cover:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Enero;
- what external help is available, for example through Anti-Slavery Australia, the Modern Slavery Helpline (UK), Gangmasters (UK), Labour Abuse Authority (UK), similar organisations in the relevant jurisdiction and the "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps Enero should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from Enero's supply chains.

## Awareness-raising programme

As well as training staff, Enero will raise awareness of modern slavery issues by periodically circulating emails to staff.

## Board approval

This statement was approved on 15 August 2019 by Enero's Board of Directors, who review and update it annually.

**Date: 15 August 2019**