

Modern Slavery Statement

December 2024

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 2023-2024.

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 is an international network of marketing and communications businesses with a workforce of approximately 900 FTE. We have a diverse skillset working in 12 countries and 16 cities around the world including Sydney, Melbourne, San Francisco, New York, Houston, Minneapolis, Singapore, Kuala Lumpur, Bangalore, Tokyo, London, Madrid, Paris, Milan, Munich and Frankfurt. We also have affiliates in key markets. Enero's subsidiaries include BMF Advertising, OBMedia (part-owned), Hotwire Global, Orchard Marketing, and ROI DNA.

Enero and its subsidiaries have a varied range of business to business and business to consumer clients of all sizes, from small businesses to large enterprises 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.

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

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 through short and direct supply chains.

Countries of operation and supply

Enero currently operates in the following countries: Australia, the United States, the United Kingdom, France, Germany, Italy, Spain, Singapore, India, Malaysia and Japan.

Due Diligence

Enero is committed to an ongoing management process to identify, prevent, mitigate and account for the potential risks of modern slavery as follows:

- identifying and assessing potential and actual high risk activities;
- communicating findings across Enero and its subsidiaries;
- reviewing progress periodically; and
- publicly communicating what we are doing by publishing this Statement, and related policies, on our website located at www.enero.com.

Consultation Process

Enero conducts its annual modern slavery training via key Finance and People & Culture representatives across each of its global businesses.

Each session is designed to educate our people on how to manage modern slavery risks, and is presented in an interactive manner, fostering open discussion around Enero's approach to addressing modern slavery risks.

As part of completing the training session, attendees also complete a form that includes a section dedicated to their input on modern slavery training, ensuring a collaborative effort in refining our strategies and practices.

High-risk activities

Enero has 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; and
- access to grievance mechanisms.

Responsibility

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

- **Policies:** Enero Group Legal and Enero Group People & Culture departments.
- **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 and Enero Group People & Culture departments continue to conduct ongoing training, including in calendar year 2023, as and where applicable, 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 our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

Policies

Whistleblowing policy (<https://www.enero.com/investor-centre/governance/>)

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 isn't one for the relevant jurisdiction, contact the Enero Group General Counsel.

Employee code of conduct (<https://www.enero.com/wp-content/uploads/2019/05/Enero-Code-of-Conduct-2019.pdf>)

Enero is committed not only to complying with legal obligations but also to ethical and responsible business practices. The Code of Conduct sets out Enero's commitment to conducting business with honesty, integrity and in a manner consistent with reasonable expectations of investors and the broader community.

Anti-Bribery and Corruption Policy (<https://www.enero.com/wp-content/uploads/2020/05/Enero-Group-Anti-Bribery-and-Corruption-Policy-Oct-2019.pdf>)

Enero is committed to the highest standards of ethical conduct and integrity and to ensuring that its employees and associated persons act in compliance with all applicable laws of the countries in which the Enero Group operates globally. This expressly includes compliance with all laws prohibiting improper payments or inducements to any person, including public officials.

Supplier diligence and review

Enero undertakes due diligence when considering engaging new suppliers, and reviewing its existing suppliers. Enero's diligence and reviews are implemented on a case by case basis and may include the following:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- reviewing on a regular basis 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;
- developing trusted relationships with suppliers;
- considering the use of 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

In calendar year 2020 Enero implemented fit for purpose key employee training on modern slavery as a module within Enero's wider ethics training. Every calendar year the training is conducted with new hires from the previous 12 months who are in a role we believe may interact with our suppliers.

Enero's modern slavery training expressly assesses:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected; and
- how to escalate potential slavery or human trafficking issues to the relevant parties within Enero; and what external help is available, for example through Anti-Slavery Australia, the Modern Slavery Helpline (UK), Gangmasters and Labour Abuse Authority (GLAA), and similar organisations in the relevant jurisdiction and the "Stronger together" initiative.

Assessing effectiveness

Enero seeks to demonstrate how it assesses the effectiveness of its actions by:

- establishing a process to review our undertakings via an annual senior management review of Enero's response to modern slavery;
- ensuring policies and procedures are current and that if, and when, a new market is entered consideration is given as to whether new risks may arise;
- continuing regular engagement and feedback between legal, finance and people and culture departments;
- conducting internal audits or monitoring of specific steps taken to assess and address modern slavery risks;
- tracking actions taken and measuring their impact. For example, levels of awareness among staff; and
- considering any trends in publicly reported cases.

Board Approval

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



Signed by Brent Scrimshaw, CEO and Executive Director

Date: 4 December 2024

Revision History

Revision #	Date
1	August 2020
2	December 2021
3	December 2022
4	December 2023
5	December 2024