



**Clear Channel Outdoor Holdings, Inc**

**ETHICAL SUPPLY CHAIN STATEMENT**

**(incorporating [Clear Channel International Limited](#) and [Clear Channel UK Limited's](#)  
MODERN SLAVERY STATEMENT)**

**2021 to 2022**

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## INTRODUCTION

The United Kingdom Modern Slavery Act came into effect in October, 2015. This Act requires commercial organisations doing business in the UK that supply goods or services and have an annual turnover exceeding £36 million to publish an annual Ethical Supply Chain statement.

This Ethical Supply Chain statement (the “**Statement**”) sets out the steps taken by Clear Channel Outdoor Holdings, Inc (“**Clear Channel**”) to eradicate modern slavery in its operations and supply chains. This statement applies to Clear Channel’s wholly owned subsidiaries doing business in the UK, including Clear Channel International and Clear Channel UK.

## OUR STATEMENT

Clear Channel is one of the world’s leading Out of Home advertising companies. We help advertisers create inspiring out-of-home campaigns via traditional and digital display formats in roadside, urban, transit and airport environments, on street furniture and near retail points of sale.

As a leading global media company, we believe we have an obligation to help address critical issues affecting the communities we serve. Clear Channel takes the working conditions of its employees, contractors and sub-contractors and those of employees in our supply chain very seriously and we have a zero-tolerance approach to human rights abuses.

## OUR OVERSIGHT

Environmental, Social and Governance matters are overseen by the Clear Channel Board’s Nominating and Corporate Governance Committee pursuant to the committee’s Charter and as further set out in our Proxy Statement, and are supported by our Compliance, Legal and Audit functions.

## OUR POLICIES

Clear Channel continues to take steps towards ensuring our supply chain provides fair working conditions in accordance with those International Labour Organisation standards ratified in each country in which we operate, including but not limited to the UN Guiding Principles on Business and Human Rights, the UN Global Compact and the Base Code of the Ethical Trading Initiative:

1. our Company Values (which vary by division) include Fairness and Integrity;
2. our Code of Business Ethics and Conduct sets out Clear Channel’s approach to a healthy working environment for its own staff and contractors who work with Clear Channel;
3. our Human Rights Policy has been developed with reference to the UN’s Universal Declaration of Human Rights and The International Labour Organisation Declaration on Fundamental Principles and Rights at Work, and includes provisions on human trafficking and modern slavery, freedom of association and collective bargaining; and
4. our Human Resources policies vary by market but include compliance with local employment legislation. We conduct appropriate background checks including relating to identity and eligibility to work in the jurisdiction employed.

## OUR SUPPLY CHAIN

Clear Channel works with numerous suppliers globally. Our risk assessment varies depending on the products and services we purchase:

1. Our procurement procedures include tailored due diligence and setting appropriate technical, financial and commercial standards.
2. Our supplier framework agreements include clauses imposing specific requirements in relation to obligations under relevant legislation, including where appropriate the UK Modern Slavery Act.
3. Our Supplier Code of Conduct, developed with reference to the UN's Universal Declaration of Human Rights and The International Labour Organisation Declaration on Fundamental Principles and Rights at Work, sets out our approach to a healthy working environment for key suppliers which work with our international divisions.
4. We undertake internal audits with site inspections of key suppliers on an ongoing basis, including reviews of working conditions and other Compliance reviews.

## OUR TRAINING AND RISK AWARENESS

Clear Channel will continue to strengthen its approach to managing the risk of modern slavery by ensuring its strategy is responsive to its changing risks, including by:

1. providing annual training on ethical conduct, mandatory for all employees;
2. providing key employees with an understanding of Compliance risks, including human rights abuses, in our senior executive onboarding and due diligence training, with further tailored training and guidance communicated proportionate to risk; and
3. maintaining an independent Hotline across all markets for employees to alert us to risks, including human rights abuses.

## OUR OUTREACH AND CHARITABLE SUPPORT

Clear Channel continue to promote the importance of Corporate Social Responsibility:

1. Clear Channel is applying to become a signatory to the UN Global Compact in 2021;
2. We engage with workers' associations regularly where they exist in our markets;
3. We continue to promote ethical Corporate Social Responsibility messages across our media, including messages aimed to help combat modern slavery:
  - a. Clear Channel Outdoor Americas partner regularly with Polaris in different states across the US, with a campaign on strategically located billboards to educate the public on the true scale and diverse victims of human trafficking;
  - b. Clear Channel Outdoor Americas continued their longstanding support for Human Trafficking Awareness month with a 2020 anti-human trafficking campaign called "Take the Pledge" and a 2021 campaign called "Support Survivors". The annual Californian campaigns invite and challenge members of the community to declare their support of the efforts to combat human trafficking and exploitation;
  - c. in 2021, Clear Channel Outdoor Americas have scheduled a Texas-wide anti-human trafficking campaign we'll launch in June with the McCain Institute and the governor's office;
  - d. Clear Channel Outdoor Americas partnered with A21 non-profit "Can You See Me?" anti-human trafficking campaign in Galveston county, Texas through 2019 and 2020 to equip the general public to recognize indicators of human trafficking, and report suspected scenarios.
  - e. Clear Channel UK have prioritised donations of billboard space to those charities advancing the UN Sustainable Development Goals, as part of CC Europe's Platform for Good initiative; and
  - f. Clear Channel International sponsored the University of South Wales' MSc Global Governance Student Impact Awards, celebrating students making an impact in social justice.

## GOING FORWARD

We will continue to monitor working conditions in our supply chain with particular focus on:

1. identifying low, medium and high-risk areas and strengthening our work in the areas of greatest risk;
2. building a holistic approach that includes support for our business partners and suppliers where required; and
3. training for our internal teams, including relating to at risk relationships.

## RELATED DOCUMENTATION

The Clear Channel Values, Human Rights Policy, Code of Conduct & Ethics, Supplier Code of Conduct, Supplier Framework Agreement and Clear Channel Terms and Conditions are available on request or, where applicable, on our website.

Clear Channel is unaware of any ethical issues in its supply chain that contradict this Statement.

Signed by:



date: 9<sup>th</sup> April 2021

**William Eccleshare**

**CEO**

**Clear Channel Outdoor Holdings, Inc.**