

WPP MODERN SLAVERY STATEMENT 2019

This statement covers the financial year 2019 and describes our commitment and steps taken to mitigate modern slavery in our business and supply chain.

ABOUT US

WPP is a creative transformation company. We build better futures for our clients through an integrated offer of communications, experience, commerce and technology. We offer capabilities in advertising, branding and identity, content, media investment, public relations and public affairs, and healthcare.

In line with UK and international law, WPP respects human rights and does not tolerate any form of modern slavery or human trafficking in any part of our business. We are a member of the [United Nations Global Compact](#) and [report progress against its 10 principles annually](#).

We support clients to create brands with purpose and to integrate sustainability into their strategies, communications and marketing. The work we do for clients reaches billions of people each year. To ensure our influence is positive, we help manage any human rights risks arising from clients’ marketing campaigns.

We also provide pro bono creative services to organisations working on human rights, health, education, arts and the environment, and negotiate free media space for charity campaigns, enabling them to reach a wide audience.

Find out more information about our business [here](#).

CASE STUDY: EVERYONE COUNTS

CLIENT: UNHCR, THE UN REFUGEE AGENCY

The UN Refugee Agency asked Blue State to help celebrate the strength, resilience and skills that refugees can bring to their new communities. The social media campaign is backed by Goodwill Ambassadors, high-profile supporters, refugee advocates, and mayors who all share positive stories of refugees on their social media channels. It highlights how everyone plays a part in countering xenophobia, and that everyone counts.

RESULTS

- 36** Goodwill Ambassadors and high profile supporters
- 7m+** video views
- 538m** people reached on Twitter





WPP's ORGANISATIONAL STRUCTURE

WPP is headquartered in London, and is listed on the London Stock Exchange and NYSE. Its subsidiaries offer services across communications, experience, commerce and technology. The WPP Group employs more than 100,000 people across 3,000 offices in 112 countries. For more information about our companies please see [here](#).

We acknowledge that the risk of modern slavery exists across all of our operations in the UK and all other markets where the WPP Group operates. Each of our companies are responsible for managing their own workforce. However, we consider the risk of our direct employees – skilled professionals – being victims of modern slavery is low.

OUR SUPPLY CHAIN

ASSESSING RISK IN OUR SUPPLY CHAIN

Due to the organisational structure of our business and diversity of services that we offer, we have a complex and dynamic supply chain ecosystem to manage.

To date, the methodology applied to assessing our risk of modern slavery within our own business operations and our supply chain has involved:

- assessing the risk amongst WPP previously 'approved suppliers' (e.g. onboarded by Group Procurement) across nine categories of spend in 12 of our largest markets; and
- referring to Maplecroft's Global Modern Slavery Risk Index to develop a categorisation of risk from high to low across these selected suppliers (as reported in our previous statement).

In 2019 we engaged an external consultant to evaluate our risk assessment process and provide recommendations on how we can make improvements. We have assembled a working group (with members of our procurement, legal, governance and sustainability teams) who will develop a plan to:

1. improve our risk assessment methodology and extend it across our supply chain; and
2. embed a new modern slavery risk assessment within our wider governance and control environment.

Intended outcome: To strengthen our ability to dynamically identify and manage modern slavery risks in a manner that better reflects the nature of the criminal activities we are committed to combatting.

The impact of our previously referenced statement (box above) regarding the dynamic and agile nature of our supply chain means that at any given point we estimate that we work with over 130,000 companies across our supply chain. Our suppliers fall into two main categories: those providing goods and services that we use to run our companies such as IT, travel, telecommunications, professional services and facilities; and those providing services used in client work, such as advertising production and market research.

Our Group Procurement team, led by our Chief Procurement Officer appointed in late 2019, manages centrally negotiated contracts with approved suppliers. A significant proportion of procurement is through contracts that are negotiated by budget holders within our companies. Our sustainability team supports Group Procurement and our companies to implement our responsible sourcing standards. Our expectations of suppliers are set out in the [Supplier Code of Conduct](#), which is based on the WPP's [Code](#) that applies to all our people. As WPP continues its business transformation programme over the next 24 months, and in response to the recommendations provided as part of our external assessments, WPP will seek to further consolidate and centralise key supply chain categories such as travel, promotional goods and facilities management to continuously improve the control and command over the supply chain. This will facilitate greater ability to monitor and track modern slavery risks and enable WPP to react efficiently to issues as they arise.

IDENTIFYING AND MANAGING THE RISK OF MODERN SLAVERY

OUR POLICIES

We do not tolerate any form of modern slavery or human trafficking in any part of our business. We outline this commitment and set clear ethical standards for our people and companies through our policy framework.

Our [Business Code of Conduct](#) outlines how we are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity. We specifically reference the Modern Slavery Act to highlight how seriously we take this issue. All of our people are required to uphold, our Business Code of Conduct, which is available in multiple languages.

Our [Business Code of Conduct – Supplier Version](#) sets out our expectations of suppliers and is based on the WPP Code that applies to all our companies and people. The supplier version includes requirements for labour practices (such as anti-harassment and discrimination, and health and safety), human rights (including no child, forced or bonded labour), and social impacts (such as anti-bribery and corruption) as well as other sustainability issues. It is available in multiple languages.

WPP's Code of Conduct is set within a wider ethical framework, which includes our [Human Rights Policy](#). Our Human Rights policy reflects international standards and principles including the International Bill of Human Rights, the UN's Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Children's Rights and Business Principles. In addition, we have a [Sustainability Policy](#) which outlines our positive contribution to society and the environment underpinned by our responsibility to respect human rights.

Our Procurement Policy outlines a clear procedure for responsible procurement. This includes the provision that, wherever possible, our companies should use centrally negotiated contracts with approved suppliers for commonly purchased goods and services. Regardless, anyone who buys goods and services in any WPP company must consider sustainability risks and criteria to determine whether suppliers are fit for

purpose. Our sustainability team works our companies to ensure that they maintain the effective implementation of a responsible procurement policy and process.

Our talent policies set out our core principles for responsible recruitment and people management as part of our responsibility to treat our employees with dignity and respect. As such, we are a living wage employer accredited by the Living Wage Foundation. This means that WPP, the parent company, and all our UK companies pay the voluntary living wage to our people and all on-site contractors such as cleaning, security and catering staff in the UK. This exceeds the UK's statutory national living wage.

We communicate our policy framework to our companies via the intranet, newsletters, eLearning, onsite training and emails. Our Group Chief Counsel and Head of Sustainability oversees our policy framework as part of our approach to ethics and compliance. We ask suppliers and senior managers in all our companies to sign a copy of the WPP Code of Business Conduct each year, to confirm they will comply with its principles. The WPP legal and internal audit teams assess compliance and investigate any alleged or confirmed breaches of our Business Code of Conduct.

CONTINUAL IMPROVEMENT

WPP is a dynamic group with ever-evolving business operations and we recognise that there are always improvements that can be made to the way we work. To ensure that our policies are kept up-to-date and compliant with international and national regulatory frameworks we conduct regular reviews. This year, we will establish a working group of senior management to review our sustainability and human rights policies in order to ensure that they are aligned with WPP's culture and standards of ethics and can be implemented effectively.

DUE DILIGENCE IN OUR BUSINESS AND OUR SUPPLY CHAIN

As per our Procurement policy, at the supplier selection phase, Group Procurement ensure that all potential suppliers read and sign WPP's [Business Code of Conduct – Supplier Version](#), confirming that they will comply with our standards or demonstrate that they have the equivalent standards in place. Before WPP proceed with a commercial relationship, either this document should be signed and returned, or the supplier must demonstrate that they comply with equivalent standards. In addition, suppliers are required to complete self-assessment supplier questionnaires, which include specific questions on modern slavery and are used to strengthen our due diligence process. Any issues raised on these questionnaires are flagged to the relevant WPP team for further investigation.

As part of the supplier onboarding stage, we include a "right to audit" provision in the supplier documentation and in 2019 we updated our global Supplier Agreement to include a specific clause relating to modern slavery. WPP reserves the right to terminate its contract with any supplier who is found to be in breach of, or who fails to comply with, any legislation pertaining to modern slavery.



THIS YEAR

We continued to assess our operations and supply chain to further our understanding of modern slavery risks. In line with the Australian Modern Slavery Act, we mobilised a focused programme of activities to commence tiering mapping of our direct suppliers. This included trialling an algorithm-based risk assessment approach to country, category, industry and spend. The output of this is now being analysed in order to incorporate learnings and prepare a plan for the next steps.

In 2019 we commissioned an independent consultant to assess the maturity of our supply chain management policies and processes. Following this evaluation, our Chief Procurement Officer commenced the complex planning for the design, build and configuration of an automated solution of our supply chain systems across WPP to upgrade data insights on our suppliers. Working with Global Procurement, the sustainability team is taking this opportunity to embed new controls and processes and develop a more mature responsible sourcing programme. This will, in turn, improve how we monitor and manage our modern slavery risks within our supply chain.

TRAINING AND AWARENESS

All of our people complete our online ethics training, How We Behave, as part of their onboarding process. Topics covered include diversity, human rights, anti-bribery and corruption, conflicts of interest and avoiding misleading work. In 2020, How We Behave will be refreshed and new modules will be introduced on sustainability and business integrity. Global Procurement are also trained on the risks of modern slavery within our business and supply chain as part of the supplier onboarding process.

The sustainability team have also issued guidance and training materials on modern slavery for our businesses to communicate to relevant people in their operations. The training covers the basic principles of the Modern Slavery Act 2015 and explains what modern slavery encompasses, how to assess risk in different aspects of our business and supply chain, our key policies, and our reporting mechanism.

As part of our work on the Australian Modern Slavery Act, the Australian procurement and legal teams gained a critical awareness of modern slavery and the risks it poses to our business.

SENIOR SPONSORSHIP

In 2019, we strengthened our governance of sustainability by establishing a Board-level Sustainability Committee to steer our approach, including our commitment to tackling modern slavery. We also increased our sustainability expertise at Board level with two new Non-Executive Director appointments. Keith Weed brings his experience as ex-chief marketing officer at Unilever and as president of the UK Advertising Association and a board member of Business in the Community, while Jasmine Whitbread has held senior positions at Oxfam and Save the Children.



MONITORING

We have Human Resource, Legal, Business Integrity and Internal Audit teams dedicated to ensuring compliance with law, policy and process across the business, including all those aiming to prevent modern slavery. We review our policies and procedures on a regular basis.

The Board, assisted by the Audit Committee, has overall responsibility for our internal control and risk management system. The Sustainability Committee has responsibility for sustainability issues.

Our people and suppliers can report concerns or suspected cases of misconduct in confidence through our third party-managed Right to Speak facility, which is overseen by our legal and business integrity teams.

We relaunched Right to Speak following the appointment of our new CEO in 2018, to ensure all our people knew how to raise concerns. In 2019, we received 361 reports via Right to Speak; all were followed up, investigated where appropriate and reported to the Audit Committee, and none identified modern slavery.

THIS YEAR

In 2019, each of our networks established risk committees to monitor risk, compliance and business integrity across our markets. Our Chief Procurement Officer sits on the WPP Risk Committee.

COLLABORATION

We will continue to expand and extend the work we do in our sustainability programme to our operating companies as part of our efforts to ensure there is no forced labour or human trafficking within our global operations or supply chains.

WPP is also committed to working with other businesses and governments to act against modern slavery. In the UK, we are a member of the Business Against Slavery Forum (BASf), which is convened by the UK Home Office.

This year, WPP have collaborated with other corporate members within this group to deliver a Business Against Slavery Conference. This event will bring together businesses and leading experts to consider best practice business responses to the risks of modern slavery.

We will work closely with our clients, suppliers and industry partnerships to raise awareness about human rights and modern slavery.

CASE STUDY: TRANSPORT INITIATIVE FOR SURVIVORS OF MODERN SLAVERY

Using public transport to reach job interviews or appointments is prohibitively expensive for many survivors of modern slavery and can be a barrier to recovery.

In 2019, we supported the launch of an initiative, alongside charity Hestia, the Rights Lab from The University of Nottingham, The Salvation Army, Transport for London, and other companies, to understand the transport needs of survivors of modern slavery in London and build the evidence needed to push for policy change in this area.

Hestia said, “We are incredibly grateful to WPP for their support to this important and innovative project. Transport poverty is a significant barrier in the recovery and integration of survivors of modern slavery whom we support”.

From December 2019 to February 2020, 100 survivors of modern slavery in London received Oyster cards, which were topped up fortnightly. They then took part in surveys and interviews to provide qualitative and quantitative data. The findings, due to be published in early summer 2020, will include policy recommendations for government to improve the provision of transport for those in the National Referral Mechanism, a framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support.

The Rights Lab said, “It is through research and evidence gathering such as this that we start to get an insight into the daily realities for survivors of modern slavery and can understand what is needed to enable them to thrive and not fall back into exploitative situations”.

OVERVIEW: OUR PROGRESS SO FAR AND NEXT STEPS

	Our Progress	Next Steps
Identifying and Managing the Risk of Modern Slavery	<p>Supply Chain Management Review: In 2019 we commissioned an independent consultant to assess the effectiveness of our supply chain management policies and processes.</p> <p>Current Due Diligence extended: 100% of all new suppliers onboarded by Group Procurement in 2019 in our 12 largest markets completed our revised Supplier Questionnaire.</p>	<p>Improving maturity of responsible sourcing programme: Our Chief Procurement Officer is leading an automated consolidation of our supply chain systems across WPP in order to upgrade data insights on our suppliers. Working with Global Procurement, the Sustainability team will explore how to embed new controls and processes and develop a more mature responsible sourcing programme. This will, in turn, improve how we monitor and manage our modern slavery risks within our supply chain.</p>
Awareness and Training	<p>Identified key companies for ‘deep dive’ assessments: Four UK companies have been engaged for an internal engagement exercise with WPP to explore how they implement responsible procurement practices.</p>	<p>Conduct ‘deep dive’ assessments: Sustainability team will work with management team in four UK companies as a pilot to explore how they implement responsible procurement practices.</p>
Monitoring	<p>Right to Speak: we reviewed and followed up concerns received through our Right to Speak facility. We received and reviewed 361 reports, none of which identified modern slavery.</p>	<p>Ongoing monitoring: We will continue to address concerns received from stakeholders.</p>

Approved by the Board on 20 March 2020

Signed:

Mark Read

Chief Executive Officer

WPP plc