# **Modern Slavery Statement**

## Our Group's Organisational Structure

WPP is the world's largest communications services group. We are made up of leading operating companies in: Advertising; Media Investment Management; Data Investment Management (formerly known as Consumer Insight); Public Relations & Public Affairs; Branding & Identity; Healthcare Communications; Direct, Digital, Promotion & Relationship Marketing; and Specialist Communications.

WPP plc's main management offices are located in London and New York and we have hubs in India, Singapore, Hong Kong, Seoul, Shanghai, Tokyo, Sydney and São Paulo.

Within the WPP group, which includes WPP plc and our operating companies, we directly employ 128,000 people and, when associate companies are included, we have approximately 190,000 people working in 3,000 offices located in 112 countries.

#### **Our Policies**

We do not tolerate any form of modern slavery or human trafficking in any part of our business. This commitment is outlined in our Human Rights Policy, which 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.

Our commitment is also reflected in our Code of Business Conduct, our Sustainability Policy and our Code of Business Conduct – Supplier Version. These policies inform and influence all of our business practices and all operating companies are required to adhere to these policies. However, implementation of these policies are determined at operating company level and is their responsibility.

#### Due Diligence in Our Business and Our Supply Chain

We have conducted an internal risk assessment and ascertained that as a professional services firm the risk of trafficking or slavery in our direct workforce is very low.

The WPP group has a large global supply chain as WPP and our operating companies buy goods and services from thousands of suppliers around the world. WPP have a central Commercial and Procurement Services (C&PS) team and they manage the appointment of "preferred suppliers", where contracts are entered into the WPP parent level. A "preferred supplier" is defined as one that has been appointed following evaluation against a variety of assessment criteria, including risk, operational, commercial and sustainability considerations. WPP expects all suppliers to abide by the same principles outlined in the WPP Business Code of Conduct. As part of our contracts with suppliers, it is a mandatory requirement that they either sign the WPP Code of Business Conduct for Suppliers or confirm their adherence to their own Code of Business Conduct that comprises of the same principles.

As part of a due diligence exercise, we have assessed the risk of modern slavery amongst our "preferred suppliers" with whom we have a direct contractual relationship across nine categories within our supply chain. We also assessed one unique group of "preferred" and non-preferred promotional goods suppliers, as they are considered our highest risk category. Following the development of an internal tool, which covers country and category risk, we have now mapped and graded the risk of modern slavery among these suppliers.

Each WPP operating company is required to use WPP's "preferred suppliers" for commonly purchased goods and services, whenever possible. In addition, each operating company is expected to maintain a list of locally preferred suppliers based upon the formal selection process outlined in WPP's

procurement policy. It is the responsibility of our operating companies to select, monitor and manage any suppliers that they use if they are not listed on WPP's central "preferred supplier" list.

We are currently reviewing WPP plc's existing procurement procedures to assess whether more extensive modern slavery considerations should be integrated into our due diligence process for working with suppliers.

### Monitoring

WPP have a third party managed "Right to Speak" helpline that is in place throughout the business and is overseen by WPP's legal and internal audit departments. All employees (direct and indirect) have access to this helpline where they can report any concerns or suspected cases of misconduct, including suspicions of forced labour or trafficking activities. This is publicised through induction packs, the Group intranet, the WPP Policy Book and our ethics training. Each operating company is responsible for ensuring that all employees are informed about the helpline.

WPP recently launched a new sustainability programme that will enable us to work with our operating companies and encourage them to embed our sustainability standards across all their business operations. The programme involves a variety of activities including assessment, onsite visits and awareness training that will allow us to identify any gaps relating to sustainability issues, including risks around modern slavery. As part of this programme, we will develop key performance indicators for modern slavery risks that will enable us to monitor and manage the issue within all our business operations more efficiently.

## Training

In early 2017 we conducted compulsory onsite training with WPP's central Commercial and Procurement Services Team on the risks and issues of modern slavery within our business and supply chain. We will be extending this training to other teams within WPP and our largest operating companies.

We have also issued guidance to our operating companies reiterating that we do not tolerate people trafficking or forced labour, and providing examples of risk areas. It is the responsibility of our operating companies to ensure that this is communicated to all employees within their operations.

#### Next Steps

WPP is committed to maintaining high ethical standards, protecting human rights and acting with honesty and integrity in everything we do. We endeavour to understand where there are risks of modern slavery within any part of our business and supply chain so that we can address them appropriately and sustainably.

WPP is a dynamic group with ever evolving business operations and so we recognise that there are always improvements that can be made to the way we work. We regularly review and refine our policies and procedures. WPP plc will continue to expand and extend the work we do in our Sustainability Programme to our operating companies as part of our efforts to eliminate all forms of forced labour and human trafficking from our operations and supply chains across the group.

This statement was approved by the Board of WPP plc on 20 April 2017.

Paul Richardson, WPP Group Finance Director