

# UK MODERN SLAVERY ACT STATEMENT

# NIELSEN AND ITS APPROACH TO HUMAN RIGHTS

With a presence in 106 countries, Nielsen's data is the science behind what's next. Our mission is to provide clients with the most complete understanding of what consumers watch and buy. We have employees throughout the world in the fields of research, technology and product development, and our supply chain similarly consists of purchases in three high-level categories: technology, services and measuring equipment. We collect information about consumption of products and media through various data sources. As a global company with a commitment to integrity and corporate social responsibility, we manage and monitor the risks of human and labor rights violations associated with our operations and the suppliers who are core to our business across the globe.

Pursuant to the United Kingdom Modern Slavery Act 2015, Chapter 30, Part 6, Provision 54, Nielsen Holdings plc and other relevant group companies (Nielsen) have taken steps during the financial year to identify any sources of potential risk of slavery and human trafficking in our supply chain and other parts of our business. Nielsen aligns itself with the UN Guiding Principles on Business and Human Rights which is derived from the UN Universal Declaration of Human Rights, and seeks to adhere to that standard as closely as possible. We demonstrate our commitment to human rights and the fair treatment of workers with policies and practices that prohibit human rights abuses in our organization and our supply chain, particularly with regard to voluntary or involuntary labor, human trafficking, or unacceptable work conditions, including but not limited to, conditions relating to pay, hours and environment. This commitment is further outlined in our [Nielsen Supplier Code of Conduct](#) and Nielsen's [Commitment to Human Rights](#).

Oversight over all Citizenship & Sustainability issues resides with our Board of Directors, specifically within the [Nomination and Corporate Governance Committee Charter](#) of our Board of Directors. We also manage relevant risks and opportunities through a variety of ongoing internal engagement channels, like our Global Citizenship & Sustainability Council (GCSC) of cross-functional leaders across our business, and through subject-matter specific groups like our Human Resources Sustainability Council and our Technology/Operations Sustainability Council. More information about our overall efforts across

environmental, social and governance areas critical for our business can be found in our [Nielsen Global Responsibility Report](#) and our [non-financial materiality assessment](#).

Human rights is also embedded within our Enterprise Risk Management (ERM) framework. This multi-channel collaboration to assess and address risks across our business allows us to take a more comprehensive approach to human rights risk management to ensure that we are conducting ongoing, in-depth assessments through our existing due diligence processes, monitoring and reporting on these risks, and taking appropriate actions when needed to provide remedy, integrating any relevant findings into our organizational processes and policies as needed.

# HOW NIELSEN IS MAKING EFFORTS TO REDUCE THE RISK OF HUMAN TRAFFICKING AND SLAVERY IN ITS SUPPLY CHAIN

Prior to contracting with a supplier, Nielsen establishes a baseline of expectations regarding social compliance through our Supplier Code of Conduct. We assess the social compliance risk of new suppliers prior to contracting with them and require the management systems necessary to address any potential violations after the contract is made.

In 2015, Nielsen adopted its first Supplier Code of Conduct. In 2016, Nielsen became a supporting member of the [Electronics Industry Citizenship Coalition \(EICC\)](#), and we updated our [Supplier Code of Conduct](#) to incorporate key aspects of the EICC Code of Conduct. The EICC Code is a supplier code which has been adopted by more than 100 Fortune 500/multinational corporations engaged within the global electronics supply chain. We have chosen to align ourselves with this

industry code and organization due to the particular risk of exposure to labor exploitation within the technology and electronics equipment manufacturing segments of our supply chain. We use our best endeavors to ensure all suppliers agree to adhere to our supplier code or their own equivalent code and to include contractual requirements mandating legal compliance.

Nielsen takes the following steps to address social compliance risks in our supply chain:

Nielsen uses its best endeavors to ensure supplier compliance with our human rights policies through its Strategic Partnerships & Sourcing organization (which provides appropriate oversight through planning, control, monitoring, measurement, corrective action, auditing, review and reporting).

**Verification:** Nielsen collects data on strategic suppliers who are core to our business using two third-party supplier self-assessments. The first self-assessment gathers information generally about strategic suppliers' environmental, social and governance (ESG) policies at the company level. It also verifies supplier disclosure with documentation such as written company policies, third party certifications, and membership or adherence to widely recognized industry standards such as the EICC, along with media and NGO reports. From these data points, a scorecard is generated on ESG risks for our strategic suppliers.

Nielsen understands that the electronics industry poses greater risks of human rights and supply chain violations than other sectors, particularly in certain territories. To address this particular risk, in addition to the required ESG assessment, Nielsen requires electronics manufacturing suppliers in high-risk countries to complete a specific social compliance questionnaire addressing human rights and fair labor conditions at the production facility level. These self-assessments will be required of strategic suppliers on an annual basis to monitor and evaluate human rights and labor risks within supplier organizations. The results of these questionnaires, along with other supplier due diligence tools and subsequent dialogue, determine the need for social audits to be conducted by a third-party audit firm.

Additionally, for suppliers in the electronics industry, Nielsen uses an online, third-party platform available to members of the EICC to assess conformance with the EICC Code Section A.1, which states, among other standards, that: "Forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used." This risk assessment online platform is used to evaluate specific supplier and factory risks with respect to the Code (including Section A.I) by inherent risk, sector and location.

**Supplier Engagement:** Nielsen's Sourcing team engages with strategic suppliers several times a year through regularly scheduled on-site factory visits, conference calls and meetings. Engagement at the company and production facility level is ongoing and aims to

address performance and quality concerns, as well as unsatisfactory facility conditions, environmental health and safety issues, and social compliance.

In 2016, Nielsen established a supply chain sustainability program to systematically address environmental, social and governance risk in our supply base. Activities to address social and human rights risk focused primarily on collecting baseline level data through questionnaires, dialogue and third-party due diligence to assess risks and identify further action, such as the need for social audits. Nielsen completed the risk assessments and verification for our top strategic suppliers, including each of the suppliers in the most at-risk segments of our supply chain, and based on these assessments, determined mitigating actions and corrective action plans with those suppliers.

**Capacity-Building and Training:** To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Nielsen ensures training is available for staff. Through membership in the EICC, we make online training modules on the Supplier Code of Conduct available to Nielsen employees as well as suppliers. In addition, there are specific modules on related topics particularly relevant to issues of human trafficking and modern slavery. Modules can be assigned to internal staff and suppliers and participation can be tracked. Nielsen also provides further training to those with a direct supplier relationship to ensure they are readily capable of identifying any potential abuses.

**This statement is made pursuant to sections 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 12/31/16.**

**Signature of director:** *DM Burns*

**Name of company:** Nielsen Holdings plc

**Date:** 4/27/17

## ABOUT NIELSEN

Nielsen Holdings plc (NYSE: NLSN) is a global performance management company that provides a comprehensive understanding of what consumers watch and buy. Nielsen's Watch segment provides media and advertising clients with Nielsen Total Audience measurement services for all devices on which content — video, audio and text — is consumed. The Buy segment offers consumer packaged goods manufacturers and retailers the industry's only global view of retail performance measurement. By integrating information from its Watch and Buy segments and other data sources, Nielsen also provides its clients with analytics that help improve performance. Nielsen, an S&P 500 company, has operations in over 100 countries, covering more than 90% of the world's population. For more information, visit [www.nielsen.com](http://www.nielsen.com).





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