



WPP Modern Slavery Statement 2021

The following statement has been prepared in fulfilment of WPP plc ("WPP") and its subsidiaries obligations under the Modern Slavery Act 2015. This statement covers the financial year 2021 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 use the power of creativity to build better futures for our people, planet, clients and communities 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.

Respect for human rights is a fundamental principle for WPP and we do not tolerate any form of modern slavery or human trafficking in any part of our business. As a member of the [United Nations Global Compact](#), we remain committed to embedding its ten principles for human rights, labour, environment and anti-corruption in our business and [report progress against its 10 principles annually](#).

We know that modern slavery exists in the countries in which we operate and we recognise the important role that our business has to play in combatting exploitative labour practices from our operations and supply chain.

The work we do for our clients reaches billions of people and has the power to shift perception and change behaviour at scale.

We support our clients to create brands with purpose and to integrate sustainability into their strategies, communications and marketing as they focus on translating targets into tangible change.

With over \$50 billion of advertising placed in the media each year, WPP is the world's largest buyer of advertising space through its subsidiary, GroupM. To ensure that our influence is positive, GroupM is a member of Global Alliance for Responsible Media (GARM), a cross-industry initiative established by the World Federation of Advertisers to address the challenge of harmful content on digital media platforms and its monetization via advertising.

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.

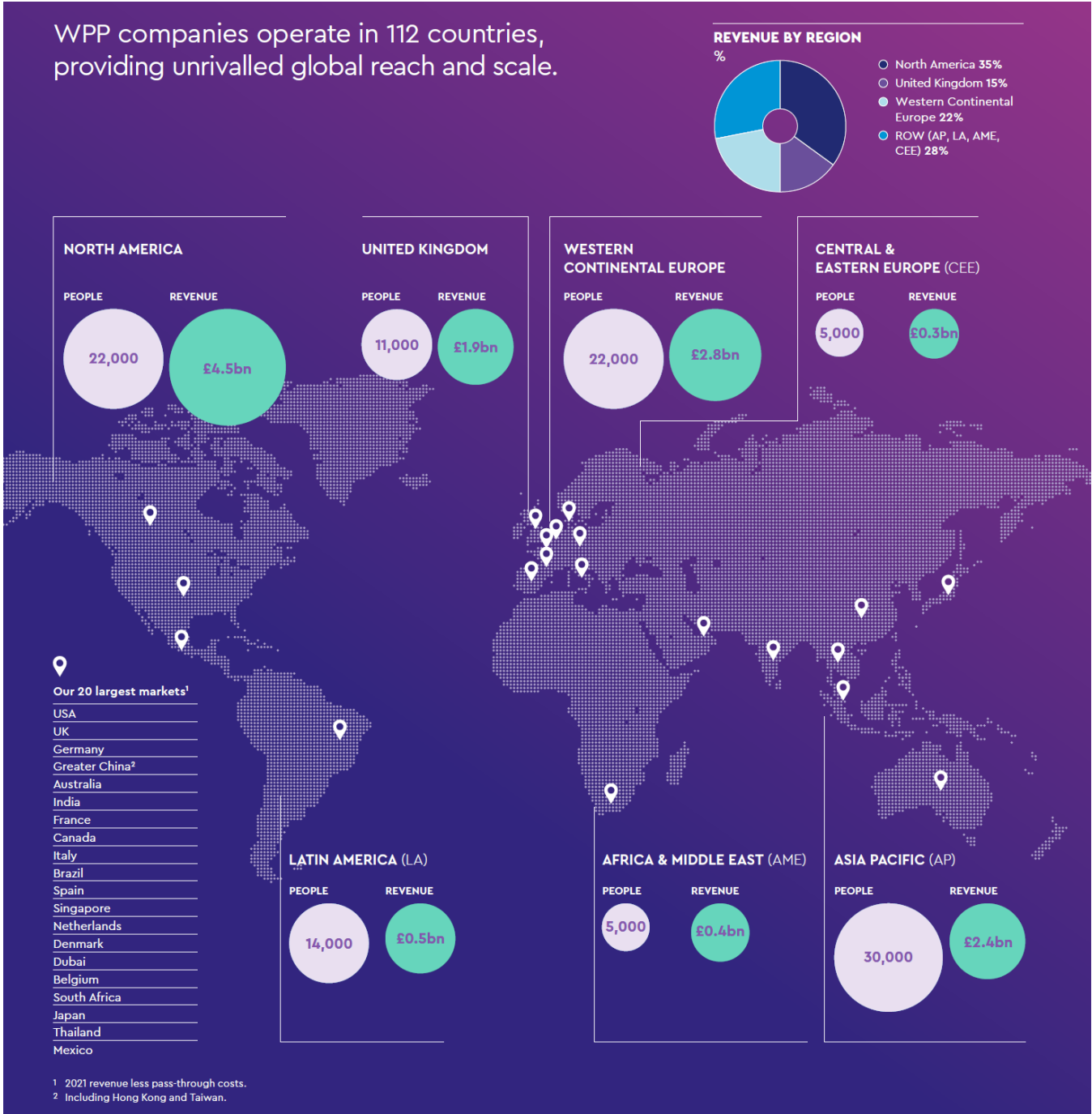
Find out more information about our business [here](#).



OUR OPERATIONS

WPP and our agencies employ 109,000 people in 112 countries across the globe and work with clients including 317 of the Fortune Global 500. WPP is headquartered in London and is listed on the London Stock Exchange and NYSE.

Here we show our presence by region in terms of revenue and people:



Following a desk-based risk assessment of WPP's direct operations we have noted that WPP has a physical presence and business operations in 'high risk' countries based on Global Slavery International's Modern Slavery index. However, based on the Walk Free Foundation's Modern Slavery Business Toolkit, which outlines sectors at high risk of modern slavery, we consider the risk of our direct employees – as skilled professionals within the advertising, marketing and communications services sector – being victims of modern slavery is low.



OUR SUPPLY CHAIN

WPP is committed to creating an inclusive, sustainable, ethical and diverse network of business-enabling suppliers.

Due to the organisational structure of the business and wide range of services on offer, we have a complex and dynamic supply chain ecosystem to manage. We work with more than 75,000 companies across our supply network.

Our suppliers fall into two main categories: those providing goods and services used to run our companies such as IT, travel, telecommunications, professional services and facilities; and those used in client work, such as advertising production and market research.

RISK ASSESSMENT

We assess supply chain risk based on country, industry, and procurement category. This is then combined with a supplier-specific questionnaire covering governance, compliance, sustainability, human rights and labour standards for WPP suppliers.

Within the category assessment, we consider several high-risk factors linked to human capital, especially the recruitment and employment of low-skilled labour, migrant labour and contractors.

In 2020, we began an extensive transformation programme to modernise our procurement ecosystem and infrastructure and optimise how we buy. Workstreams include expanding our spend analytics tool across all markets by the end of 2022 and standardising processes and systems. The programme will facilitate the introduction of full life-cycle mapping and traceability across WPP's supplier ecosystem. It is being led by our Chief Financial Officer and Chief Global Business Services Officer, with support from WPP's Group sustainability team to embed the new controls and processes that are critical to a robust and responsible sourcing programme.

In 2022 as part of this transformation we will conduct human rights due diligence in high-risk procurement categories that are managed centrally by our global procurement team. This exercise will give us further visibility and transparency within our Tier 1 suppliers and help us further refine our risk assessment methodology.

DUE DILIGENCE IN OUR SUPPLY NETWORK

Our expectations of suppliers are set out in the Supplier Code of Conduct and are based on the WPP [Business Code of Conduct](#) which applies to employees.

During supplier selection and before WPP enters into a commercial agreement, the procurement team ensures all potential suppliers sign WPP's [Business Code of Conduct – Supplier Version](#), confirming they will comply with our standards or demonstrate that they have the equivalent standards in place.

These standards include requirements relating to human rights, including modern slavery issues such as child, forced or bonded labour), as well as labour practices (such as anti-harassment and discrimination, and health and safety), social impacts (such as anti-bribery and corruption) and other sustainability issues.



Our Code requires suppliers to apply similar standards to companies within their own supply chain, including evidencing diversity and social responsibility in their cultures, behaviours and attitudes.

WPP suppliers are also required to complete a self-assessment questionnaire which includes specific questions on modern slavery. Any issues raised from the responses 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 where appropriate, and our global Supplier Agreement includes a specific clause relating to modern slavery compliance.

WPP reserves the right to terminate its contract with any supplier found to breach or fail to comply with, any legislation relating to modern slavery.

OUR POLICIES

We do not tolerate any form of modern slavery or human trafficking in any part of our business. WPP is committed to tackling the risk of modern slavery from our supply chain and operations at a global scale.

As a member of the United Nations Global Compact, WPP views this as an important component of our obligations to support the basic human rights of our people and their families, including the right to fair conditions of work, freedom from forced labour and child labour. 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 nine languages.

The principles of the Code are embedded in our training courses and workshops and our senior managers are required to certify compliance with the Code on an annual basis.

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, our [Sustainability Policy](#), updated in 2022, outlines our positive contribution to society and the environment underpinned by our responsibility to respect human rights. We also introduced a new [Environmental Policy](#) in 2022 to reflect our climate commitments.

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 should consider sustainability risks and criteria to determine whether suppliers are fit for purpose. Our sustainability team works with our companies to support them in maintaining 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 no less than 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.

WHERE WE ARE NOW

- 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. In January 2022 we updated our sustainability policy.
- The application of our policies and procedures is monitored within each company and by the internal audit, legal, business integrity and risk and controls functions. Breaches are investigated by our legal and business integrity teams and, where appropriate, external advisors.

GOVERNANCE

We have established governance processes and policies to help us manage human rights risks, including modern slavery, consistently across the Company.

Our Group Chief Counsel oversees our approach to ethics and compliance. The Board and Executive Committee provide additional oversight and guidance on any ethical issues that may arise.

The Board, assisted by the Audit Committee, has oversight and responsibility for our approach to risk management which is structured through our three lines of defence model and driven by our risk governance framework, business integrity programme, culture based upon the principles set out in our Code of Conduct and our internal control framework. For more information about our Risk Governance Framework and Business Integrity Programme" please see our [Annual Report 2021](#), from page 88.



Our Board-level Sustainability Committee has responsibility for reviewing and considering WPP's Modern Slavery Statement and sustainability-related policies, including the Company's Human Rights Position Statement, for approval by the Board.

Our policy framework and training set clear ethical standards for our people and agencies. We want to embed a culture of integrity and transparency where our people make the right decisions automatically and instinctively.

The WPP Code of Business Conduct applies to everyone at WPP. It sets out our responsibilities to our people, partners and shareholders to act ethically, legally and with integrity. Senior managers in all our agencies and our businesses are asked to sign a copy of the WPP Code of Business Conduct each year to confirm they will comply with its principles.

INSTITUTE OF BUSINESS ETHICS

WPP is a member of the Institute of Business Ethics (IBE) and considers it an important partner and support for the approach that the Company takes to business integrity, sustainability and ethics. As set out more fully in 'Risk Governance Framework' and 'Business Integrity Programme' from page 88 of our Annual Report 2021, we want to champion and facilitate a culture where our people feel that acting with honesty and integrity is an expected metric for success and this is also the IBE's ethos. The IBE shares knowledge and good practice as well as advice on the development and embedding of relevant policies through networking events, regular publications and training sessions, research and benchmarking reports. The IBE is a registered charity funded by corporate and individual donations.

REMEDATION

Our people can report concerns or suspected cases of misconduct confidentially (and, if they wish, anonymously) through our independently managed Right to Speak facility, which is overseen by our business integrity team within our legal function and is available via phone or email in local languages. We publicise the facility in induction packs, on our intranet and external website, in offices, in the WPP Policy Book and via our mandatory ethics training.

Our people can also speak directly to our business integrity team who receive a number of reports through emails, calls, texts and in-person appointments.

RISK IMPACT FROM WHISTLEBLOWER REPORTS 2021

All whistleblower reports received by the Group Chief Counsel and General Counsel, Corporate Risk, which includes all Right to Speak reports, are handled in line with WPP's Whistleblowing and Investigations Protocols and logged, investigated and tracked through to a conclusion including any remediation or follow-up actions that might be required.

Reports are also analysed for risk impact and root causes. Learnings generated from this analysis are converted into recommendations including for training sessions, workshops and practical resources by WPP's business integrity team and implemented together with the support and input of the Risk Committees. Recommended remediation can also include disciplinary action, changes to systems, controls and processes or wider review and monitoring for a particular time period.



The nature of each report, action taken and outcome is reported to the Audit Committee and the approach and process are reviewed by the auditors.

WPP is committed to providing a safe and confidential way for people with genuine concerns to raise them, and to do so without fear of reprisals. WPP does not tolerate any retaliatory behaviour against individuals reporting concerns and is equally committed to preserving the anonymity of an individual who makes a report and does not wish to have their identity revealed.

The consequences of misconduct or retaliation range from individual performance management, training for a business or an office and one-on-one training or coaching for an individual through to staff relocation and staff dismissal.

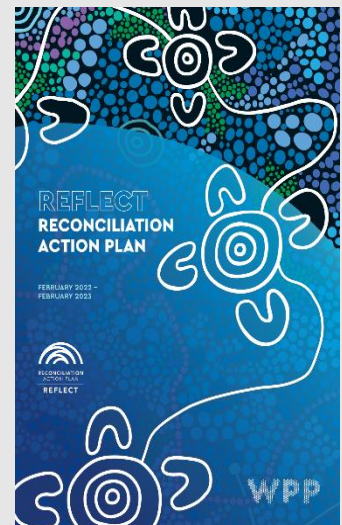
WHERE WE ARE NOW

- In 2021, WPP moved to a new Right to Speak supplier and refreshed all Right to Speak literature and communications focusing in particular on explaining what happens once people have reported and emphasising the importance of speaking up and WPP's zero tolerance policy on retaliation.
- There has been a steady increase in the number of reports received from whistleblowers over the past few years. Every report received is investigated and reported into the Audit Committee by WPP's business integrity function. In 2021, we received a total of 494 reports from whistleblowers (2020: 418), 333 of which were through the Right to Speak hotline. None of these reports was linked to concerns of modern slavery.

WPP AUNZ

In line with the Australian Modern Slavery Act 2018, WPP AUNZ has outlined its own modern slavery risk assessment process, first conducted in 2020. The key purpose of WPP AUNZ's initial risk assessment was to identify the areas of likely greatest modern slavery risk in WPP AUNZ's own supply chain. This exercise then formed the foundation of WPP AUNZ's subsequent focus in its ongoing due diligence and remediation activities. For more information about their risk assessment read their Modern Slavery Statement available [here](#).

Our first [WPP 'Reflect' Reconciliation Action Plan \(RAP\)](#), outlines our total commitment towards a more diverse, equitable and inclusive future - with reconciliation at the heart of our ambitions. The plan, which has been formally endorsed by Reconciliation Australia, pays respect to the rich culture of Aboriginal and Torres Strait Islander peoples. It enables us to deepen our understanding of our sphere of influence and the unique contribution we can make to lead progress across the five dimensions of reconciliation: race relations; equality and equity; institutional integrity; unity; and historical acceptance.





UKRAINE

Conflict increases the risk of human trafficking. More than 5 million refugees have left Ukraine since the conflict began, with those fleeing their homes vulnerable to trafficking and exploitation.

WPP employs 200 people in Ukraine, and their safety has been our priority. We have been in constant contact with our leaders in Ukraine to provide whatever help we can for our employees, including immediate financial support, assistance with evacuation and accommodation, and medical and security advice. We have made a commitment to provide ongoing employment for all our people, whether they have left or remain in Ukraine.

For employees and their families who have had to leave the country we are offering a comprehensive package of support, covering areas such as housing, living expenses, healthcare, schooling and language classes. Our leaders in Central and Eastern Europe have formed a 'United for Ukraine' taskforce to keep track of Ukrainian colleagues and their families in the region and meet their short- and medium-term needs. Given the psychological and emotional impact of these traumatic events on our people we have stepped up counselling support across the region.

Our people around the world have made their own contribution by donating to the UNHCR appeal set up by WPP agency Blue State to support those forced to flee their homes. More than 4,000 individuals between them donated \$670,000, which WPP has matched, bringing the total to \$1.34 million. The wider public campaign run by Blue State with UNHCR had generated \$150 million by the end of March 2022. The funds raised are being used by UNHCR, the UN Refugee Agency, to provide emergency shelter, relief items such as blankets, emergency payments and community support for the millions of people displaced by the conflict.

TRAINING AND AWARENESS

All of our people (including freelancers working for more than four weeks) are required to complete our online ethics training, How We Behave, promptly upon joining and then on an annual basis thereafter. Topics covered include diversity, human rights, anti-bribery and corruption, conflicts of interest and avoiding misleading work.

WPP has also issued guidance and training materials on modern slavery for our businesses to communicate to relevant people in their operations, such as HR Directors. 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 remediation process.

COLLABORATION

WPP is 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.

Recognising that advertising production includes suppliers from high-risk sectors (such as support services such as catering, security and construction) we have joined the TV Industry and Human



Rights Forum (TVIHRF) as an observing party. The TVIHRF are committed to identifying and tackling exploitation in collaboration with the broadcasting and production industry more broadly. We are exploring how to extend collaboration and apply learnings from the TVIHRF working groups to the advertising production industry.

WHERE WE ARE NOW

- In 2021, more than 100,000 employees, freelancers and contractors completed our mandatory online ethics training.
- In 2022, we will refresh our ethics training, including an update to the sustainability module which covers human rights and modern slavery.
- In 2022, we will launch a refresher training module on Modern Slavery and Human Rights for the Global Procurement team.

MAPPING OUR PROGRESS

	In 2020 we stated that:	Our progress to date:	Next steps:
Identifying and Managing the Risk of Modern Slavery	<p>In 2020, we began an extensive transformation programme to modernise our procurement ecosystem and infrastructure and optimise how we buy. Workstreams include expanding our spend analytics tool across all markets by the end of 2022 and standardising processes and systems.</p> <p>We will be re-issuing and relaunching our procurement and supplier policies as new processes through the programme are introduced.</p>	<p>The programme will facilitate the introduction of full life-cycle mapping and traceability across WPP's supplier ecosystem. It is being led by our Chief Financial Officer and Chief Global Business Services Officer, with support from WPP's Group sustainability team to embed the new controls and processes that are critical to a robust and responsible sourcing programme.</p>	<p>In 2022 as part of this transformation we will conduct human rights due diligence in high-risk procurement categories that are managed centrally by our global procurement team. This exercise will give us further visibility and transparency within our Tier 1 suppliers and help us further refine our risk assessment methodology.</p>
Awareness and training	<p>Sustainability Audit was sent to WPP's operating companies across 21 key markets to establish a 'baseline' of ESG practices. The audit contained questions relating to the monitoring and management of human rights, including risk assessment and responsible procurement practices.</p>	<p>Results from Sustainability Audit fed into Group Procurement transformation to inform a roadmap for continual improvement around modern slavery.</p>	<p>In 2022, we will launch a refresher training module on Modern Slavery and Human Rights for the Global Procurement team and refresh our ethics training, including an update to the sustainability module which covers human rights and modern slavery.</p>
Monitoring	<p>Right to speak: In 2020, we reviewed and followed up concerns received through our Right to Speak facility. We received and reviewed 418 reports, none of which identified modern slavery.</p>	<p>Right to speak: In 2021, we received 494 whistleblower reports, none of which identified modern slavery. We appointed a new Right to Speak supplier and refreshed all Right to Speak literature and communications.</p>	<p>Ongoing monitoring: We will continue to address concerns received from stakeholders</p>

Approved by the Board on 24 May 2022

Signed:

Mark Read
Chief Executive Officer
WPP plc