

SUSTAINABILITY

At WPP we use the power of creativity to build better futures for our people, clients and communities.

WHY SUSTAINABILITY MATTERS

As the last decade drew to a close, the World Meteorological Organization confirmed it was the warmest on record. Australia experienced its hottest, driest year, leading to devastating bush fires, while the Indonesian capital Jakarta saw deadly floods caused by the heaviest rainfall since records began.

Climate activism continues to grow as people demand change. More and more companies across sectors see both the opportunities and the imperative to act. Consumers and investors increasingly expect businesses to act with purpose and offer inclusive and sustainable products.

There is increasing evidence that sustainable business drives profit and long-term value – sustainable investment assets were valued at \$30 trillion in 2018, up a third from 2016¹, while companies with long-term strategies are outperforming their peers financially².

Meanwhile, the United Nations' Decade of Action to 2030 will see accelerated efforts to end poverty, inequality and environmental harm, and deliver the Sustainable Development Goals. More than ever, sustainable business models are needed that will enable society to survive and thrive in the new decade and beyond.

Our clients must navigate complex social, environmental and economic pressures against a backdrop of skills shortages, demographic shifts, political uncertainty, and a consumer base increasingly impatient for change.



"OUR INDUSTRY HAS A RESPONSIBILITY TO USE OUR POWERS FOR GOOD – TO INFLUENCE NORMS AND CHANGE BEHAVIOUR. WE CAN'T WAIT FOR OTHERS TO ACT: IT'S UP TO US TO LEAD THE WAY."

Andrea Harris
Group Chief Counsel
and Head of Sustainability

¹ Global Sustainable Investment Alliance 2018 Global Sustainable Investment Review.

² Harvard Business Review.

Twój Weekend

OSTATNI NUMER
W HISTORII

8 MARCA 2019

**SHUT DOWN
TO OPEN UP**

AGENCIES
VMLY&R AND WAVEMAKER

CLIENT
GAZETA.PL

When liberal news portal Gazeta.pl wanted to start a national debate in Poland about everyday sexism and gender inequalities, they turned to VMLY&R and Wavemaker for help. The agencies suggested they team up with MasterCard and BNP Paribas to buy *Twój Weekend (Your Weekend)*, one of Poland's longest-running and most-read adult magazines. And then close it down. Before they shut it down, the team reimagined its last issue, The Women's Issue, filling regular sections and columns with content on gender portrayal, sexism, equal rights and more. The project was supported by an advertising campaign, including outdoor, media, cinema, radio, press, social media and online.

4.5m
organic reach

25m
media impressions

Winner
Cannes Titanium Lion, Grand Prix,
and three bronze Lions

48 STRON BEZ SEKSIZMU

Cena: 9,99 zł (w tym 8% VAT)

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We continue to support our clients as evidence mounts of the need for sustainable innovation and growth.

OUR RESPONSE

Our clients look to us for the insight, expertise and creativity to balance these interconnected pressures and communicate their purpose effectively and authentically. Our own sustainability strategy helps us to meet changing client expectations with strong and credible propositions, while reducing risks and creating a resilient business for the long term.

SUSTAINABILITY AND OUR STRATEGY

Our sustainability strategy supports all five elements of our corporate strategy, which we launched in late 2018. The table opposite sets out the most material ways in which sustainability supports our strategy.

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDGs)

We support the UN SDGs as a framework for government agencies, civil society, the private sector and citizens to work together to create a more sustainable future.

We have analysed the 17 Global Goals and the 169 targets which sit behind them to identify those which are most relevant for our business. To learn more about the Goals we believe we can make the most significant contribution towards, see page 11 of our full Sustainability Report 2019, available as a PDF download.

STRATEGIC ELEMENT	SUSTAINABILITY STRATEGY		
VISION & OFFER	<p>A STRONGER OFFER FOR OUR CLIENTS</p> <p>A growing number of clients are grappling with sustainability challenges and looking to articulate the purpose of their brands. They look for partners who share their sustainability values and aspirations. Our commitment to responsible and sustainable</p>	<p>business practices helps us to broaden and deepen these partnerships, and to meet the growing expectations and sustainability requirements in client procurement processes.</p>	<p>A stronger offer for our clients, see page 64 Transparency and trust, see pages 76 and 77</p>
CREATIVITY	<p>SOCIAL INVESTMENT</p> <p>Our pro bono work can make a significant difference to charities and NGOs, enabling our partners to raise awareness and funds, recruit members and achieve campaign objectives.</p>	<p>Pro bono work benefits our business too, providing rewarding creative opportunities for our people that often result in award-winning campaigns that raise the profile of our companies.</p>	<p>Social investment, see page 66</p>
	<p>INCLUSIVE AND DIVERSE TEAMS</p> <p>Creativity thrives on diversity of background and thought. This makes having an inclusive and diverse workplace essential to our long-term business success.</p>	<p>We want all of our people to feel valued and able to fulfil their potential, regardless of gender, ethnicity, age or disability.</p>	<p>Attracting and retaining talent, see pages 68-70</p>
DATA & TECHNOLOGY	<p>PRIVACY AND DATA ETHICS</p> <p>Data – including consumer data – can play an essential role in our work for clients. Data security and privacy are increasingly high-profile topics for regulators, consumers and our clients. We have a</p>	<p>responsibility to look after this data carefully, to collect data only when needed and with consent where required, and to store and transfer data securely.</p>	<p>Privacy and data ethics, see page 78</p>
SIMPLER STRUCTURE	<p>GREENER OFFICE SPACE</p> <p>Our work to simplify our structure and consolidate our office space is driving a positive impact on our energy use and carbon footprint. We are reducing the overall number of offices we occupy and</p>	<p>moving to Campus locations that: use green building standards; reduce our impact; help us to use space more efficiently; and encourage collaboration between our companies.</p>	<p>Environment, see page 72</p>
PEOPLE & CULTURE	<p>SHARED VALUES ACROSS OUR BUSINESS AND SUPPLY CHAIN</p> <p>Strong employment policies, investment in skills, and inclusive working practices help us recruit, motivate and develop the talented people we need to serve our clients in all disciplines across</p>	<p>our locations. Selecting suppliers and partners who adopt standards consistent with our own can reduce costs, improve efficiency and protect our reputation.</p>	<p>Attracting and retaining talent, see pages 68-70 Supply chain, see page 74</p>

A NOTE ON OUR SUSTAINABILITY DATA

During 2019 we agreed the sale of 60% of Kantar to Bain Capital. To ensure comparability to 2019 figures, which exclude Kantar, prior year figures have been restated. 2018 figures, and 2017's where provided, have been restated in sections highlighted with the symbol .

For our full review of our sustainability activities and outcomes, download our Sustainability Report 2019.



wpp.com/sustainability



5.993.714 OF US LIKE

STRENGTH IN NUMBERS

AGENCY
SANTO BUENOS AIRES

CLIENT
SPRITE

Sprite wanted to show Gen Z that there should not be any topics they feel too uncomfortable to talk about. So Santo launched You Are Not Alone, a series of forums on Reddit where young people can express their feelings on issues that make them feel isolated. To get the conversation started, Santo asked influencers to share their own experiences to show people they are not alone.

80%
increase in positive sentiment

300%
increase in free media

20x
more consumer engagement than previously

November 2019



BOTH GIRLS AND BOYS

PUTTING SUSTAINABILITY AT THE HEART OF OUR OFFER FOR CLIENTS

The work we do for our clients reaches billions of people each year, presenting our greatest opportunity to create positive change.

Our clients must balance a complex set of social and environmental challenges with changing consumer expectations and constant technological developments. While challenging, today's landscape also offers major opportunities to create new markets for more inclusive and sustainable products and services.

WORK WITH IMPACT

In response, our clients increasingly aspire to generate a lasting positive impact through their brands and look to us to help them express and enhance that impact through brand purpose and strategy, communications and marketing. The breadth and depth of our expertise means we can offer clients the latest technology alongside the creativity and sustainability expertise needed to inspire consumers and help shift behaviour to more sustainable norms.

This work is of growing importance to WPP. We are already engaging with corporate, government and NGO clients on issues ranging from plastic waste to human rights during the development of brand strategies or campaigns.

For example, in November, Mindshare's 7,000 people spent the agency's 22nd anniversary connecting with the scale and urgency of the climate crisis and how through their work they could be part of the solution with #ChangeTheBrief, an invitation for the advertising industry to use its skills to tackle the issue. #ChangeTheBrief is about creating work which answers the "Now" brief, but also the "Future" brief, to encourage the attitudes, lifestyles and behaviours which are consistent with a transition to a carbon-free world. As part of Mindshare Day, the network took live briefs from Unilever to generate #ChangeTheBrief ideas.

Recognising our clients' growing focus on sustainable products and practices, we continue to strengthen our offer to ensure we can provide our clients with the best support and the expertise they need to do well by doing good.

COMPLIANCE WITH MARKETING STANDARDS

Marketing is powerful – it can change attitudes and behaviour. It is critical that we apply high ethical standards to our work to ensure those changes are for the better. We work hard to maintain high standards and strong compliance in areas such as ethics, human rights, privacy and data security.

We require that all the work our companies produce for clients complies with all relevant legal requirements, codes of practice and marketing standards. There are occasional complaints made about campaigns we have worked on, and some of these are upheld by marketing standards authorities. Our companies take action where needed to prevent a recurrence.

Our agencies have policies and processes to mitigate against online advertising appearing on sites with illegal, illicit or unsuitable content.

ETHICAL DECISIONS IN OUR WORK

We have a review and referral process for work that may present an ethical risk, such as work for government clients, work relating to sensitive products or marketing to children.

Before our people can accept potentially sensitive work, they must elevate the decision to the most senior person in the relevant office and then to the most senior WPP executive in the country concerned, who will decide if further referral to a global

WPP executive is required. This referral process is covered in our How We Behave online training, which will contain a new sustainability module from 2020 onwards.

Our companies also have copy-checking and clearance processes for the legal team to review campaigns before publication. These processes have strict requirements in highly regulated sectors such as pharmaceutical marketing.

In 2019, WPP established Risk Committees with the aims of ensuring accountability at both the enterprise and network level and to review, monitor and advise on risk and compliance throughout all of our businesses and markets. Duties include providing reports and insights on current risk exposures, identifying new risk types and tracking and pro-actively addressing any breaches of risk limits.

1 in 5
of our top 50
clients have made
commitments to
carbon neutrality

80%
of our top 50
client leads have
discussed
sustainability
with their clients

For more examples of our client and pro bono work to address social and environmental issues, download our Sustainability Report 2019.



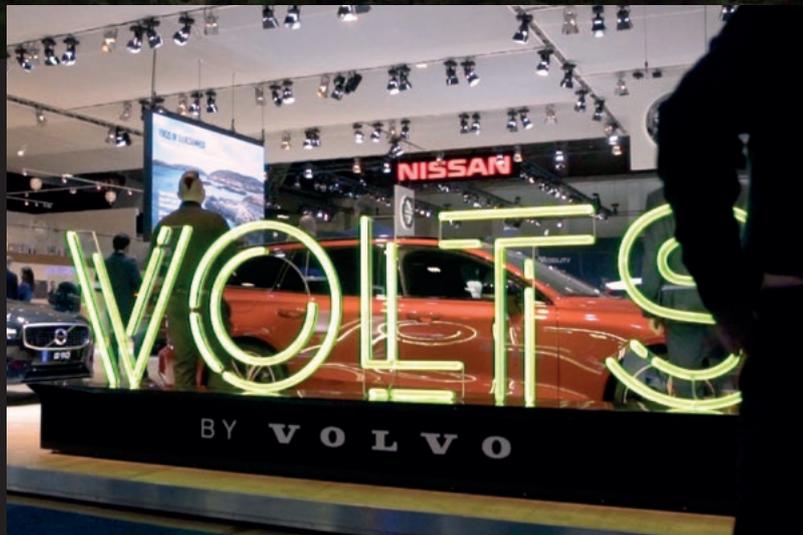
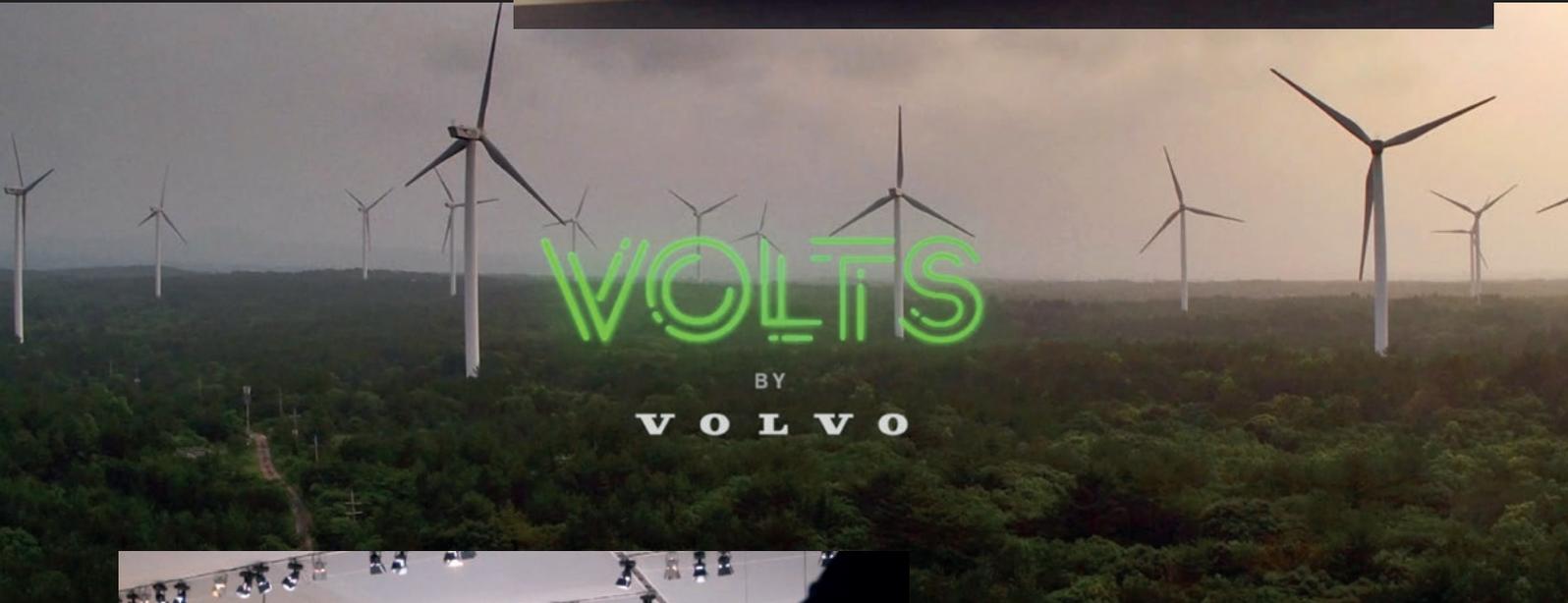
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LEADING THE CHARGE

AGENCY
FAMOUSGREY

CLIENT
VOLVO

Volvo asked FamousGrey to help them answer this question: what is the use of driving electric if you do not charge your car with green energy? To help meet this challenge, the agency created Volts by Volvo, a new energy contract for homes which provides 100% green electricity, so that drivers are not only using electric cars, but also charging them with green energy. And with the energy generated from both wind and solar and provided by green energy expert Eneco, the result is clear: no impact, zero emissions.



7.5m

Belgians reached
(population 11 million)

71%

said they would
re-evaluate their
electricity contract in a
post-campaign survey

1 in 4

drivers of electric cars
engaged with the Volts
by Volvo platform

April 2019-January 2020

SOCIAL INVESTMENT

Charities and non-governmental organisations (NGOs) do vital work, often with limited resources. We can help boost their impact by providing communications and creative services on a pro bono basis (for little or no fee).

This work is mutually rewarding. While enabling our voluntary sector clients to raise money and awareness, recruit members, and achieve campaign objectives, pro bono work also provides opportunities for our people to work on fulfilling and often award-winning campaigns that raise the profile of our companies.

WHAT WE GAVE IN 2019

Our pro bono work was worth £10.6 million in 2019 (2018: £11.3 million), for clients including UN Women and WildAid.

We also made cash donations to charities of £5.2 million (2018: £5.7 million). This resulted in a total social investment of £15.8 million (2018: £17.0 million), equivalent to 1.60% of reported pre-tax profits (2018: 1.35%).

WPP media agencies negotiated free media space worth £18.9 million on behalf of pro bono clients (2018: £23.8 million), making our total social contribution for the year £34.7 million (2018: £40.8 million).

VOLUNTEERING

In addition to providing donations and pro bono services, we encourage our people to volunteer their time. Half of our companies have formal volunteering policies in place (2018: 41%), and 61% (2018: 54%) organised volunteering activities for their people during 2019. For example, VMLY&R celebrated its first anniversary in September by closing all 82 offices so its 6,500 people could volunteer to support their local communities, a celebration that will be repeated each year.

SOCIAL IMPACT

Our support helps charities and NGOs to continue and grow their work in critical areas such as improving health and education, reducing inequality and protecting human rights. Pro bono work is often worth more than an equivalent cash donation as it raises awareness of our partners' work while helping to increase donations, recruit members, change behaviour and achieve campaign goals. We have conducted research to quantify this wider impact.

Our most recent analysis shows that in 2019 our pro bono work created wider social benefits worth £92 million (2018: £91 million). This includes, for example, the impact of charities being able to improve health and wellbeing in communities. Adding in our charitable donations and free media space as well as our pro bono work, the wider social benefits created in 2019 were worth an estimated £291 million (2018: £331 million).

COMMON GROUND INITIATIVE

Good communications are essential to bring about the shift in attitudes and behaviour needed to end extreme poverty, inequality and climate change by 2030. Common Ground is a collaboration between the world's six largest advertising and marketing services groups and the United Nations, created to serve that purpose.

We work directly with the UN through our Common Ground initiative, partnering with UN Women to tackle gender inequality.

The greatest contribution we can make towards the SDGs is through our client and pro bono work.

£92m

wider social benefits created by pro bono work in 2019

£291m

wider social benefits from pro bono work, charitable donations and free media space in 2019

Read our Quantifying our impacts report and see more examples of our pro bono work in our Sustainability Report 2019.



wpp.com/sustainability



CODE OF CONSCIENCE

AGENCY
AKQA

CLIENT
NGOs WORLDWIDE

A third of the world's protected nature reserves are under threat, with illegal deforestation a leading cause. Alongside a group of global NGOs, AKQA launched Code of Conscience: open source software that restricts the use of heavy-duty vehicles in protected areas. The code is available for free and, for the first time, gives heavy-duty vehicle manufacturers the opportunity to be part of the solution to illegal deforestation. An invitation comprising the Code of Conscience chip embedded in a wooden sculpture of an endangered animal has been sent to the CEOs of the world's top-ten construction equipment manufacturers, with a vision for all new machines to leave the factory with Code of Conscience pre-installed.

10
manufacturers
sent the code

2
countries considering
making the code law

100+
coverage in over 100 countries,
sparking positive change

ATTRACTING AND RETAINING TALENT

The insights, creativity, and expertise of our people are what bring our clients to our door. Our success depends on hiring and retaining the brightest, most forward-thinking people with the best and most original ideas.

SKILLS, TRAINING AND DEVELOPMENT

By investing in training and development, we strengthen our creative, technical and leadership skills. Providing our people with opportunities for training and for professional and personal development also helps keep them engaged in their work and with the Company.

In 2019, we spent £38.7 million on training (2018: £36.6 million) and 66% of our people took part in an average 11 hours of formal training per person. In addition, almost 60,000 people accessed online courses through LinkedIn Learning (previously Lynda.com), which provides access to thousands of courses via desktop or mobile devices.

We follow up with training participants to assess the effectiveness of a course and whether it has helped improve performance at work.

Development needs are assessed during a formal appraisal process. In 2019, 86% (2018: 87%) of our people had a formal appraisal, including 360-degree appraisals for 65% (2018: 66%) of executive leaders and 64% (2018: 66%) of senior managers.

Our people can find new roles within our companies in the UK, China and Singapore using our online job board, Springboard. In 2019, 24% (2018: 23%) of vacancies were filled by people already working within the Company.

ENGAGEMENT AND FEEDBACK

We use formal and informal mechanisms to assess and improve employee engagement and satisfaction.

Employee surveys help us assess and act on engagement and satisfaction levels. In 2020, we will launch our first Company-wide employee survey. We conducted the first inclusion survey in the UK this year and are currently analysing the results.

The vast majority (95%) of our companies carry out exit interviews with leavers, which often provide helpful feedback on our culture and practices.

To ensure our Board understands the views of our employees on WPP's purpose, values and strategy, in 2019 we established our first People Forum in the UK. Sponsored by our UK Country Manager, the Forum has representatives from across our UK business who gather feedback from their agencies to feed up to the WPP Board. The Board also consults the Forum on key people issues. In 2020, we will roll out an India People Forum representing employees from Mumbai, Delhi and Bangalore.

LABOUR RELATIONS K

We support the rights of our people to join trade unions and to bargain collectively, although trade union membership is not particularly widespread in our industry. In 2019, around 5% of our employees were either members of a trade union or covered by a collective bargaining agreement (2018: 6%). We held 1,507 consultations with works councils, mainly in Europe (2018: 476).

We have made around 3,500 redundancies as part of our transformation programme, as we merge and restructure some agencies and as a result of changes in our client base. We aim to support affected people through our employee assistance programmes.

INCLUSION AND DIVERSITY

Different backgrounds and perspectives are what drive creativity. A diverse and inclusive workplace is essential to our daily work and our long-term success. We work hard to make all our people feel valued and fulfilled at work, regardless of gender, ethnicity, age or disability.

WPP does not tolerate harassment, sexual harassment, discrimination or offensive behaviour of any kind. We select and promote our people based on their qualifications and merit, without discrimination or concern for factors such as race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age, or disability. Our Code of Business Conduct sets out this commitment, applies to all our people and is available on our website, in our Policy Book and on our intranet. Our online ethics training, How We Behave, covers diversity and unconscious bias.

GENDER BALANCE K

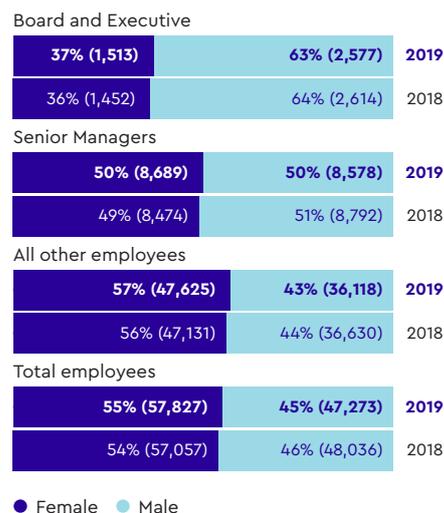
Our overall workforce has an equal gender balance and 50% of our senior managers are women (2018: 49%). During the year the proportion of women in executive leadership roles increased slightly to 37% (2018: 36%). At Board level, the proportion of women is 40%, compared with 33% in 2018 and a FTSE 100 average of 32.4%. We aim to reach parity.

In 2019, WPP joined the 30% Club, a campaign group of Chairs and CEOs taking action to increase gender diversity on boards and management teams to a minimum of 30% female representation.

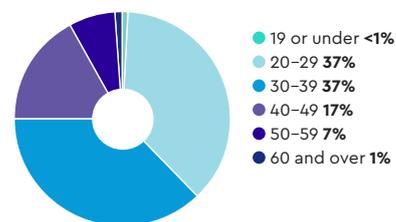
We remain a committed signatory of the Women's Empowerment Principles, a guide for businesses on how to empower women in the workplace, marketplace and community. We are also a proud partner of UN Women, which is a significant beneficiary of our pro bono work.

Our WPP Stella network expanded to France and the United States in 2019, in addition to being active in India, Italy, Mexico, South Africa, Taiwan and the UK. It aims to tackle barriers that may prevent women progressing to the most senior roles. It runs events, networking opportunities, coaching and training and maintains a speaker database to raise the internal and external profile of our senior women.

GENDER DIVERSITY K



AGE DIVERSITY K



DISABILITY

We recruit, select and promote our people on the basis of their qualifications, relevant experience, and merit, without discrimination or concern for disability. Candidates are assessed objectively against the requirements of the job, taking account of any reasonable adjustments that may be required for candidates with a disability. For people who develop a disability during their employment, we make adjustments to their working environment or other employment arrangements wherever possible, within a reasonable time frame and in consultation with the employee.

As an inclusive business we have signed up to the Valuable500, a global initiative that is putting disability on the boardroom agenda and celebrating inclusion among 500 influential businesses. As part of our commitment, we launched our new Inclusive Experience Practice, which helps brands to reach and be relevant to the widest market possible by making their communications, products and services inclusive and accessible.

FLEXIBLE WORKING AND PARENTAL LEAVE

Flexible working can make work accessible to a broader pool of talent, including parents and people with caring responsibilities, helping to create a more diverse and engaged workforce. We estimate 24% of our workforce had flexible working arrangements in place in 2019, such as part-time working, flexible hours and home working, as well as career breaks and sabbaticals (2018: 25%). More than half (55%) of our companies offer parental leave benefits that exceed local legal requirements (2018: 48%).

HEALTH, SAFETY AND WELLBEING

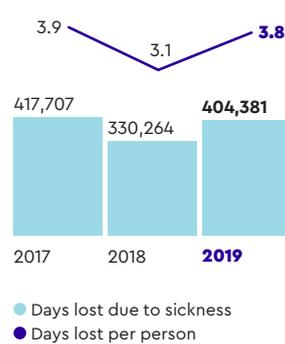
Supporting our people's physical and mental health and wellbeing is good for our people and good for business. The main health and safety hazards in our business are work-related stress and ergonomic injuries. 71% of our companies employ someone responsible for health and safety management (2018: 78%). There were no work-related fatalities in 2019.

The range of programmes on offer in our businesses include fitness facilities and subsidised gym memberships; health and nutrition services, including health insurance and medical assessments; counselling and employee assistance services; and ergonomic risk assessments and specialist equipment.

MENTAL HEALTH

Work-related stress is one of our main – and growing – health and safety hazards. Though having good policies and procedures in place for managing mental-health issues is important, we also need a working culture where people feel able to discuss concerns and seek support. In countries where very long working hours are the norm, our companies need to take additional measures. These can include overtime restrictions and monthly management reviews of overtime worked.

DAYS LOST DUE TO SICKNESS



To learn more about our programmes, including information about our training programmes and our development programmes that support our senior and mid-level women, download our Sustainability Report 2019.



INTO THE SPOTLIGHT

AGENCY
WUNDERMAN THOMPSON

CLIENT
LUX (UNILEVER)

Despite changing attitudes towards women and work in Saudi Arabia, only 16% of the workforce is female. The Unilever brand Lux turned to Wunderman Thompson to highlight women when people searched online for male-dominated jobs.

The agency launched #IntoTheSpotlight on International Women's Day and used paid search results on Google to profile leading women in the relevant fields. Linking to content on Mira, a joint venture between Unilever and Vice, this meant when someone searched for "photographers" it took the user to videos and information about leading fashion photographer Huda Beydoun.

15-20%
 increase in inquiries
 for the featured
 professionals

870,000
 people reached
 across Saudi Arabia
 on International
 Women's Day 2019



ENVIRONMENT

We support urgent action to tackle the climate crisis and aim for net zero carbon emissions in our Campuses by 2025.

OUR CLIMATE STRATEGY K

We recognise the major threat that climate change and environmental degradation pose to global social and economic development. We support urgent action to tackle the climate crisis through the Paris Agreement.

Our environmental management programmes are reducing our carbon emissions and broader environmental impact, while helping us to identify and mitigate climate-related risk. These programmes reduce costs and business risks, while meeting our clients' and colleagues' expectations.

In 2019, 25% of our floorspace was certified to advanced sustainability standards such as LEED and BREEAM, meeting our 2020 target a year early.

TASKFORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

We support the Taskforce on Climate-related Financial Disclosures (TCFD) and are developing our disclosures in line with its recommendations. The TCFD seeks to encourage businesses to disclose climate-related risks and opportunities and is structured around four themes: governance, strategy, risk management, and metrics and targets.

For our second TCFD disclosure, see pages 196 and 197.
For our carbon emissions statement, see page 199.

CIRCULAR ECONOMY

In 2019, WPP committed to take the "plastic" out of "Wire and Plastic Products" (the original name of the Company) by:

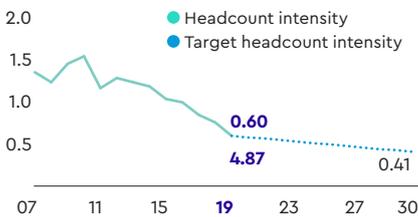
- phasing out plastics that cannot be reused, recycled or composted across all of our 3,000+ agency offices and Campuses worldwide by the end of 2020;
- signing up to the New Plastics Economy Global Commitment led by UN Environment and the Ellen MacArthur Foundation which aims to unite businesses, governments and other stakeholders behind a common vision for a plastics system that works; and
- pledging to work with clients and partners to drive consumer change at scale.

Phasing out single-use plastics across our offices is an ambitious goal but our greatest impact is through our client work. We have worked with more than 60 clients to help them reduce their own single-use plastics use, on briefs ranging from product and packaging design and innovation to consumer engagement and behaviour change.

PERFORMANCE SUMMARY

SCOPE 1 AND 2 (MARKET BASED) K

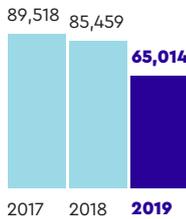
TONNES CO₂e EMISSIONS PER PERSON



Our scope 1 and 2 market-based emissions for 2019 were 0.60tCO₂e/head, a 21% reduction from 2018. Our carbon intensity per £1 million revenue was 4.87 tCO₂e/head, a 22% reduction since 2018.

CARBON OFFSETS PURCHASED

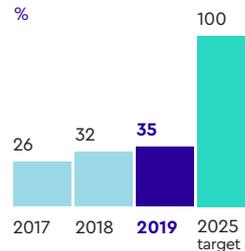
tCO₂e



Since 2007 we have purchased and permanently retired 1.55 million carbon credits to offset our carbon emissions from air travel. We offset 100% of our air travel emissions in 2019.

ELECTRICITY FROM RENEWABLE SOURCES K

%



We increased the percentage of electricity purchased from renewable sources to 35% (2018: 32%), making substantial progress towards our 50% target.

TARGETS AND COMMITMENTS

0.41
tonnes of CO₂e per employee by 2030, a 50% reduction from 2017

Net zero
carbon emissions in our Campuses by 2025

100%
renewable electricity by 2025 in line with RE100

100%
of emissions from air travel offset through the purchase of high-quality carbon credits since 2011

CHALLENGING MEATY NORMS

AGENCY
DAVID

CLIENT
BURGER KING

In the United States, animal farming is responsible for half of the carbon emissions released into the atmosphere, even if it is only responsible for 3% of the calories in our diet (LCA Impossible Foods 2019). When Burger King wanted to reduce the environmental impact of the Whopper, they turned to DAVID to help get meat-eaters to try something new. The Impossible Whopper looks, smells and tastes just like a Whopper should, but the plant-based patty delivers that same great Whopper taste with an 89% drop in carbon emissions. It is almost impossible to believe that helping the planet could taste so good.

13bn
impressions

10yrs
best-selling product launch in 10 years

\$140m
in earned media

89%
reduction in GHG emissions achieved by each Impossible Whopper compared to meat-based equivalents

April 2019



EVERYDAY CLIMATE ACTION

AGENCY
H+K STRATEGIES

CLIENT
DOCONOMY

When Swedish fintech Doconomy wanted to find an innovative solution to addressing the climate crisis, they turned to H+K Strategies. Alongside RBK Communication, H+K helped them create DO Black: a credit card with a carbon emission limit, which stops you from overspending not based on available funds but on the impact caused by your consumption. It blocks transactions exceeding the CO₂ limit, disables the credit card and notifies the cardholder, giving people a real feel for their carbon footprint.

\$100m
in earned media

80+
banks and credit card companies discussing collaboration

10,000+
registered users in Sweden

Winner
Cannes Grand Prix and a silver Lion

April 2019-January 2020



To learn more about our approach to environmental management, our full performance and our approach to carbon emissions accounting, download our Sustainability Report 2019.



SUPPLY CHAIN

We expect the companies we work with to meet high ethical, human rights, workplace and environmental standards. However, with over 130,000 companies in our supply chain, some risks will remain. We endeavour to mitigate these risks.

Our Group procurement team is led by our new Chief Procurement Officer and manages centrally negotiated contracts with preferred suppliers. A significant proportion of additional procurement is delivered through contracts negotiated by budget holders within our operating companies.

In 2019, we commissioned an independent consultancy to assess the maturity of our supply chain management policies and processes. Following this evaluation, our Chief Procurement Officer is leading a complex programme of activities designed to evaluate and implement a modernised procurement ecosystem and infrastructure. Working with Group Procurement, the sustainability team is conducting an exploratory project on how to embed new controls and processes to develop a more mature responsible sourcing programme.

SOURCING STANDARDS

Our expectations of suppliers are set out in our Supplier Code Of Conduct, which includes requirements relating to labour practices (such as anti-harassment and discrimination, and health and safety), human rights (including modern slavery issues such as child, forced or bonded labour), social impacts (such as anti-bribery and corruption) as well as other sustainability issues. Our Code requires suppliers to apply similar standards to companies within their own supply chain.

SUPPLIER SELECTION

We evaluate potential new suppliers on factors such as assurance of supply, quality, service, cost, innovation and sustainability. To continue to strengthen our due diligence, in 2019 we completed the roll-out of two additional supplier pre-selection questionnaires across 12 of our largest markets. Any "flags" raised in this process are immediately sent to the global sustainability team for investigation before any further onboarding takes place.

SUPPLIER DIVERSITY

We work with many small and diverse suppliers and this can be a source of new ideas and creativity. In the United States, around 1.6% of spend (2018: 2.1%) is with certified diverse suppliers including women- and minority-owned businesses.

HUMAN RIGHTS

Respect for human rights is a fundamental principle for WPP. We aim to prevent, identify and address any negative impacts on human rights associated with our business activities.

We look for opportunities to promote human rights, in areas such as our pro bono work.

Our Human Rights Policy Statement summarises our approach. It reflects international standards and principles, including the International Bill of Human Rights, the UN 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.

We are a member of the United Nations Global Compact and report progress against its 10 principles annually.

Our most direct impact on human rights is as a major employer. We recognise the rights of our people, including those relating to freedom of association and collective bargaining, and we do not tolerate harassment or any form of forced, compulsory or child labour. Human rights are included in the ethics training completed by all employees, which we updated during the year as part of a wider commitment.

See **attracting and retaining talent**, from page 68

We work with clients to manage any human rights risks from marketing campaigns, for example by protecting children's rights in relation to marketing. WPP companies will not undertake work designed to mislead on human rights issues.

MODERN SLAVERY

We do not tolerate any form of modern slavery in our business or supply chain.

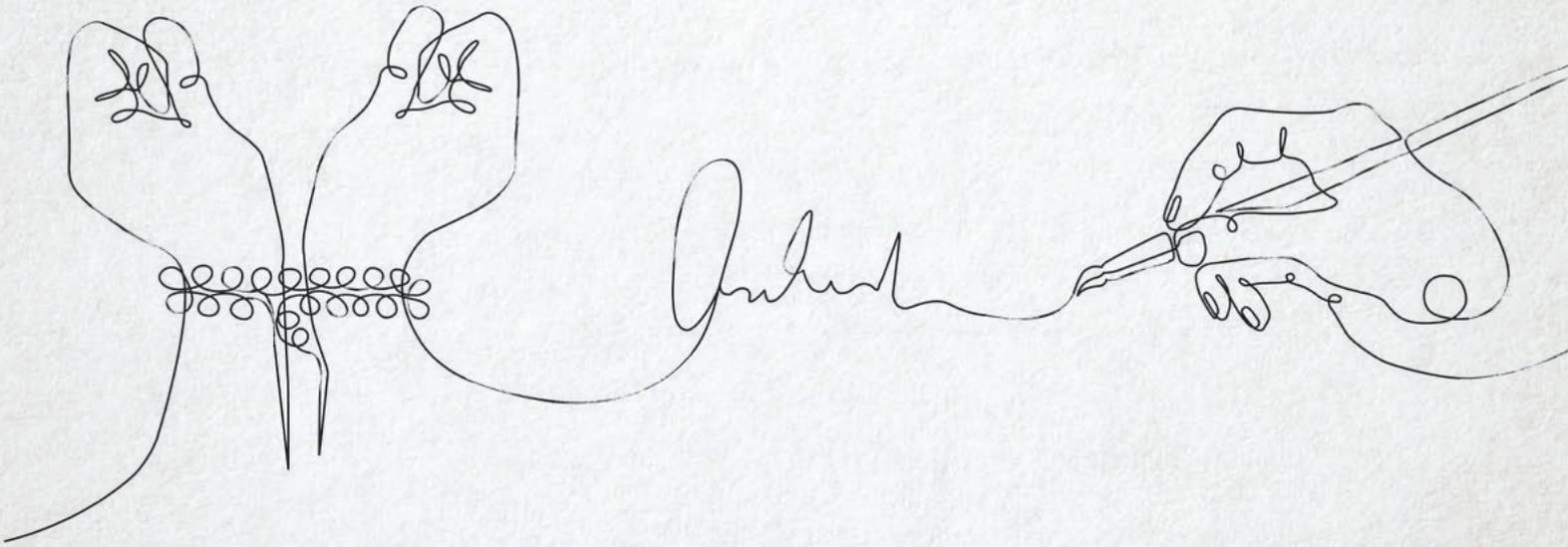
WPP recognises the prevalence of modern slavery across all countries. We aim to implement appropriate measures to mitigate the risk of it occurring, either in our own operations or those of our partners. To this end, we are working with a transnational crime consultant to help us re-evaluate our approach to managing modern slavery risks within our supply chain.

In 2019, we updated our Global Supplier Agreement to include a specific clause relating to modern slavery.

To learn more about our Supplier Code of Conduct, Human Rights Policy, and Modern Slavery Act Transparency Statement see:



wpp.com/sustainability/policies-and-resources



THE POWER OF PEN ON PAPER

AGENCY
GREY

CLIENT
AMNESTY INTERNATIONAL

Amnesty International wanted to show Indonesians that a single signature can make a big impact. So Grey created Signature, a poster series chronicling the role petitions can play in ending human rights violations such as child marriage and gender-based violence, and calling for Indonesians to take action by putting pen to paper.

25%

increase in signature pledges to Amnesty International Indonesia

October-December 2019

YOUR SIGNATURE CAN FREE INDONESIA
FROM FREE SPEECH VIOLATIONS



TRANSPARENCY AND TRUST

We can reduce risks to our business and clients by establishing clear policies and procedures in areas such as data security, ethical conduct, supply chain management, and human rights, and by being transparent about our progress.

OUR CODE OF CONDUCT

Our policy framework and training set clear ethical standards for our people and companies.

The WPP Code of Business Conduct summarises our principles and the key policies that apply to everyone at WPP. It is underpinned by more detailed policies on anti-bribery and corruption, hospitality and gifts, facilitation payments, the use of third-party advisors, human rights and sustainability. In 2019, we implemented a new Disability Policy.

We require our people to take our online ethics training, How We Behave, on joining and then on a regular basis, including after each update (at least every two to three years). Topics include diversity, human rights, conflicts of interest and avoiding misleading work. More than 57,000 employees completed the training in 2019. In 2020, How We Behave will be refreshed and new modules will be introduced on sustainability and business integrity.

Our online training on anti-bribery and corruption covers the requirements of the Foreign Corrupt Practices Act and UK Bribery Act, including issues such as hospitality and gifts, facilitation payments and the use of third-party advisors.

57,000+
people completed ethics
training in 2019

MANAGEMENT AND COMPLIANCE

Our Group Chief Counsel and Head of Sustainability oversees our approach to ethics and compliance. Senior managers in all our companies and our business and supplier partners are asked to sign a copy of the WPP Code of Business Conduct each year to confirm they will comply with its principles. Our newly established Board-level Sustainability Committee and Executive Committee sustainability working group provide additional oversight and guidance on any ethical issues that may arise.

Our people can report concerns or suspected cases of misconduct confidentially through our independently managed Right to Speak facility, which is overseen by our legal and business integrity team departments and is available via phone or email in local languages. We publicise the facility in induction packs, on our intranet, in the WPP Policy Book and via our ethics training. In 2019, we received 361 reports (2018: 200) via Right to Speak, all of which were followed up, investigated where appropriate by our legal, business integrity and internal audit teams, and reported to the Audit Committee.

ASSOCIATES, AFFILIATES AND ACQUISITIONS

We expect associate companies (those in which we hold a minority stake) and affiliate companies (preferred partners to whom we may refer business) to adopt ethical standards that are consistent with our own.

Our due diligence process for acquisitions and expansion into new markets includes a review of ethical risks including those relating to bribery and corruption, human rights or ethical issues associated with client work.

We identify any specific human rights risks associated with different countries of operation, using sources such as the Transparency International Corruption Index, Human Rights Watch country reports and government guidance.

Acquired businesses must adopt our policies and their people must undertake our ethics training within a month of joining WPP. This is agreed in an integration plan before the acquisition is finalised, and we monitor progress.

PUBLIC POLICY

Most of our public policy activity is work that our public affairs businesses carry out for clients, including direct lobbying of public officials and influencing public opinion. On occasion, we also advocate on issues that affect our business.

We believe that business can make a valuable contribution to public policy debate, but that to protect the public interest it is important to conduct all lobbying with integrity and transparency.

The majority of work undertaken by our public affairs companies takes place in the United States and the EU, although many clients are multinational businesses operating in many countries.

OUR STANDARDS

Our Code of Business Conduct and our Political Activities and Engagement Policy govern our political activities, and both are available on our website. These documents commit us to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity. Political activities in particular should be conducted legally, ethically and transparently and all related communication should be honest, factual and accurate. Our policies apply to all companies and employees at all levels.

Many of our companies are members of professional organisations and abide by their codes of conduct. Examples include the UK Association of Professional Political Consultants (APPC), and the European Public Affairs Consultancies' Association (EPACA).

WPP companies comply with all applicable laws and regulations governing the disclosure of public affairs activities. In the United States, this includes the Lobby Disclosure Act and the Foreign Agent Registration Act, which are designed to achieve transparency on client representation and require lobby firms to register the names of clients on whose behalf they contact legislators or executive branch personnel. A number of our companies are listed on the voluntary EU Transparency Register of lobbying activities.

Our companies in the United States whose sole or primary business is lobbying have representatives of both major political parties among senior management.

We will not undertake work that is intended to mislead and always seek to identify the underlying client before taking on work. We do not knowingly represent "front groups" which purport to be independent campaign groups but are in fact controlled by another organisation for the purpose of misleading.

Our Group Chief Counsel and Head of Sustainability has responsibility for developing and implementing our political activity policy and public reporting procedures. The CEO and CFO in each country or region are responsible for implementing our policy at the local level.

Any third parties conducting political activities on behalf of WPP or its companies must comply with our Political Activities and Engagement Policy. Third parties are required to complete the WPP ethics training or equivalent within their own organisation.

POLITICAL CONTRIBUTIONS

WPP companies are not permitted to make direct cash donations. Other political donations can only be made with the prior written approval of a WPP executive director. Donations must be reported to WPP legal before they are made, to confirm they comply with this policy and to obtain the necessary approvals.

POLITICAL ACTION COMMITTEES

In countries where it is consistent with applicable law, individuals working at WPP companies may make personal voluntary political contributions directly to candidates for office. Several of our businesses, including Burson Cohn & Wolfe/Prime Policy and Glover Park Group, also maintain political action committees (PACs) which accept voluntary donations from their people to support political candidates. In 2019, these PACs made disbursements worth \$128,295 (data from fec.gov).

LOBBYING AND POLITICAL ADVOCACY

We occasionally contribute to the debate on public policy issues relevant to our business, sometimes through our public affairs companies.

We advocate on sustainability issues, through partnerships such as the Common Ground initiative in support of the UN Sustainable Development Goals. In 2019, Demet İkiler, WPP Country Manager for Turkey and EMEA CEO of GroupM, joined the local board of the UN Global Compact with responsibility for diversity and inclusion. Karen Blackett OBE, WPP UK Country Manager, serves as the UK Government's Race at Work Champion, supporting the Race at Work Charter.

Our companies contribute to public policy debate in areas where they have expertise and a special interest. Our digital and research companies, for example, are involved in privacy and data protection issues.

WPP companies must implement clear procedures for employing serving or former politicians, including a six-month "cooling-off" period for people joining WPP from public office or the public sector.

MEMBERSHIP OF TRADE ASSOCIATIONS

We are members of trade associations, industry groups and membership organisations which undertake lobbying activity on behalf of their members. We select organisations with priorities and values aligned with our own and with robust governance processes. WPP companies must nominate a senior manager to manage and oversee trade association relationships. Memberships are listed in our Sustainability Report 2019.

PRIVACY AND DATA ETHICS

More than ever, data underpins, drives and contributes to the work that we do for our clients. We use the term "data" in its broadest sense, to include client data, consumer data, and all information and data related to the operating of our businesses.

We require all our people to operate in line with our Data Code of Conduct. This contains the underlying principles that: WPP, its companies and its people are committed to the responsible collection, management, use and protection of data; and we recognise our obligations to all stakeholders, including shareholders, clients, our own people, suppliers and consumers.

We focus on building our people's awareness and knowledge so everyone understands and takes responsibility for data privacy and security. We have robust standards and governance processes in place to reduce risks and comply with regulation. We partner with clients, peers and industry organisations to promote best practice.

In 2020, the focus will continue to increase on data ethics, artificial intelligence and machine learning, and privacy by design, particularly as the availability and possible applications of data increase across all areas of our business.

POLICIES AND GOVERNANCE

Since the launch of the WPP Data Privacy and Security Charter in 2018, we have issued incremental updates to reflect regulatory changes and best practices, as well as changes to our business. For example, the Charter now includes an Artificial Intelligence Statement to guide our people on its use.

The Charter helps us communicate our approach to data to our people and clients, setting out core principles for responsible data management through our Data Code of Conduct, our IT security, privacy and social media policies, and our security standards (which are based on ISO 27001).

Our Group Chief Privacy Officer leads our work on privacy, supported by our Data Protection Officer. Together, they provide practical guidance and support to our agencies on data ethics, ensure that privacy risks are well understood across the business, help us prepare for relevant new regulation, and promote best practices.

Our networks and companies have appointed privacy leads to oversee the implementation of our policies at a local level. They report progress via our Group Chief Counsel and Group Chief Privacy Officer.

AUDIT AND DUE DILIGENCE

Our company-wide audit programme includes controls reflecting the technical and organisational measures in place to protect data, as well as specific data privacy controls. Our internal audit team runs a rolling programme of audits across our companies to review privacy risks and practices using these controls.

Suppliers who collect, manage or store employee, consumer or client data on behalf of WPP, our companies and our clients must have the right data security and privacy standards in place. We conduct due diligence on data suppliers and embed privacy requirements in our supplier contracts.

TRAINING AND ENGAGEMENT

We continue to enhance our Safer Data platform, which is a well-used resource across the Group. The platform provides information, guidance and resources to help our people understand privacy risks and to apply our policies in their work.

The platform also includes our regulatory toolkits for GDPR, CCPA and LGPD, model data protection contract clauses, privacy impact assessment tools, policy templates and other topic- or jurisdiction-specific guidance and resources.

We will relaunch our mandatory global Privacy and Data Security Awareness online training in 2020. There will be updates to both the style and content of the training, making it more engaging and relevant and ensuring our people are well-trained in our data responsibilities as a company and in their individual roles. Our team also continues to run face-to-face training to reflect specific topics or regulations; for example, we have trained over 1,000 of our employees on the new California Consumer Privacy Act.

We work with clients to share insights and privacy best practices, demonstrating how we apply these across the Group and in the work we undertake for them. Our people have access to a range of resources to support them in these conversations, and our Data Privacy and Security Charter is written in a way that can be shared with clients.

As regulations continue to evolve, we partner with clients, industry organisations and peer companies on privacy and data protection issues, particularly with advertising bodies in the regions in which we operate such as the Internet Advertising Bureau (IAB) in Europe and the United States, and the UK Advertising Association.

DATA HEALTH CHECKER

We use our Data Health Checker to review privacy risks and data security practices in our businesses. This provides insight into how data is used, stored and transferred and helps to identify any parts of the business that need further support on data practices. The results show that the majority of our companies continue to have measures in place that meet or exceed their level of privacy risk (the average risk score is 2.14, where 5 is the maximum risk score). Of those companies surveyed, 80% have a dedicated privacy lead.

OUR APPROACH TO SUSTAINABILITY

EMBEDDING SUSTAINABILITY IN OUR COMPANIES

WPP sets the sustainability policy for the Group with every company responsible for implementation. We have a clear policy framework through our Code of Business Conduct, Sustainability Policy, Supplier Code of Conduct, Data Privacy and Security Charter, Human Rights Policy Statement and other policies included in the WPP Policy Book. We track progress using our social and environmental key performance indicators.

Our internal sustainability advisors are working to ensure consistent implementation of our standards. In 2019, we ran training for our top 200 global leaders on sustainability as a lever for innovation and growth. We also piloted an online resource hub to share best practice across our companies and encourage collaboration.

STAKEHOLDER ENGAGEMENT

Dialogue with our stakeholders including our people, clients and investors provides valuable feedback and insight into sustainability risks and opportunities, for our Company and our clients.

Most stakeholder engagement takes place in the course of doing business. We also carry out more formal research as part of our materiality process. We work with clients on sustainability issues (see page 64).

Information on employee engagement is on page 68.

INVESTOR ENGAGEMENT

Our involvement with investors, rating agencies and benchmarking organisations on sustainability during 2019 included: Bloomberg Gender-Equality Index; CDP; Ecovadis; Ethibel; Euronext Vigeo Europe; FTSE Russell; Human Rights Campaign Foundation's 2018 Corporate Equality Index; ISS Data Verification; MSCI Research Inc; Sustainalytics; Thomson Reuters D&I index; Trucost; and Workforce Disclosure Initiative (WDI).

We are included in the FTSE4Good Index and participate in the CDP Climate benchmark, receiving a rating of B in 2019 (2018: A-). For an explanation of this change, see Sustainability Report, page 39).

OUR MATERIALITY PROCESS

Our first formal materiality assessment in 2014 included interviews with clients, investors, NGOs, and sustainable business experts, as well as senior executives in our Company functions and our operating companies. We carried out further reviews in 2016 and 2017. In 2019, we updated our materiality assessment in light of our new corporate strategy (see Sustainability Report, pages 57 and 58).

ABOUT OUR REPORTING

Data included in this review is for the calendar year 2019 and covers all subsidiaries of the Company. Some key environmental and people data is verified by Bureau Veritas, an independent assurance provider (see Sustainability Report page 59).

NON-FINANCIAL INFORMATION STATEMENT

This section provides information required by regulation in relation to:

- environmental matters (page 72 and TCFD Statement, pages 196 and 197);
- our people (pages 68-70);
- social matters (page 66);
- human rights (page 74); and
- corruption and bribery (page 76).

In addition, other related information can be found as follows:

- business model (page 9);
- principal risks and how they are managed (pages 80-91); and
- non-financial key performance indicators (page 8).

To find further details, data, our materiality analysis and case studies, download our full Sustainability Report 2019.



wpp.com/sustainability