



## MODERN SLAVERY STATEMENT

Under the Modern Slavery Act 2018 (Cth)

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This Modern Slavery Statement has been prepared by WPP AUNZ Limited (ACN 001 657 370) of 16 - 65 Berry Street, North Sydney, NSW, 2060 (**WPP AUNZ**), in fulfilment of its and its subsidiaries' obligations under the Modern Slavery Act 2018 (Cth).

This statement covers the following reporting period: the calendar year ending 31 December 2021. It describes our commitment and steps taken to mitigate modern slavery in our business and supply chain.

This statement was approved by the board of WPP AUNZ on 29 June 2022.

**Rosemary Herceg**  
WPP President  
Australia & New Zealand

  
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Rosemary Herceg

DATE: 29/06/2022

## **Part One: Business Overview: Structure, Operations and Supply Chains**

### *Introduction and Executive Summary*

1. 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.
2. WPP in Australia and New Zealand is a wholly-owned, indirect subsidiary of WPP plc. WPP plc is a reporting entity under the Modern Slavery Act 2015 (UK) (the **UK Act**). WPP plc's Modern Slavery Statement, which covers the obligations of WPP plc and its subsidiaries (together the **WPP Group**) under the UK Act can be found [here](#).
3. This is our second Modern Slavery Statement for Australia and New Zealand, lodged pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**). This Statement addresses the Act's mandatory reporting criteria, including our continued identification of modern slavery risks in our operations and supply chains and actions we've undertaken to address and mitigate these risks.
4. Respect for human rights is a fundamental principle for the WPP Group and we do not tolerate any form of modern slavery or human trafficking in any part of our business.
5. 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.
6. We recognise that the work we do for our clients has the power to shift perception and change behaviour at scale. We also recognise that our sphere of influence gives us a unique opportunity to support and acknowledge our local communities. An example of this is the recent release of our first [WPP 'Reflect' Reconciliation Action Plan](#) (RAP), which 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.
7. You can find out more information about our business [here](#). WPP,

### *Australia and New Zealand, Business Overview*

8. WPP brings together unrivalled talent, resources and skills to provide an

integrated offer of communications, experience, commerce and technology for clients.

### *Our Structure*

9. The mandatory reporting entity under the Act is **WPP AUNZ Limited** – ABN 84 001 657 370. The complete list of WPP AUNZ 's owned and controlled entities is set out at Appendix 1 to this Statement.
10. During the reporting period, in May 2021, WPP AUNZ was delisted from the Australian Securities Exchange as a result of WPP plc purchasing (on an indirect basis) all of the remaining shares in WPP AUNZ. WPP AUNZ is now a wholly-owned indirect subsidiary of WPP plc and operates in Australia and New Zealand as it does in other parts of the world.
11. From a modern slavery perspective, we've assessed that the delisting of WPP AUNZ has not had a material change on the day-to-day operations of our business. Prior to the delisting, WPP AUNZ was majority owned by WPP plc. Therefore, becoming a wholly owned business of WPP plc has not impacted upon our overall approach to identifying modern slavery risks.
12. During the reporting period, we also sold the business and assets of one of our subsidiaries in Australia, which operated as a retail point of sale and visual merchandising business. In our First Statement, this business, as a retailer of goods, created a unique risk exposure within the group, so the sale of this business has decreased our overall risk profile for the current reporting period.

### *Our Operations*

13. We have offices in most major cities in Australia and New Zealand, as well as in various other countries as noted below. We continue to operate using our established campus system, which is an operating model and structure that encourages extensive collaboration between various co- located brands.
14. The approximate breakdown of employees and offices for the 2021 reporting period were as follows:
  - **Australia:** 15 offices and 2,533 employees
  - **New Zealand:** 4 offices and 330 employees
  - **Indonesia:** 3 offices and 206 employees
  - **Singapore:** 2 offices and 103 employees
  - **Malaysia:** 2 offices and 105 employees
  - **Vietnam:** 1 office and 17 employees
  - **Philippines:** 1 office and 1 employee
  - **Thailand:** 1 office and 1 employee

- **Hong Kong:** 7 employees, located at the office of a WPP Group company
- **Canada:** 38 employees, located at the office of a WPP Group company
- **United Kingdom:** 34 employees, located at the office of a WPP Group company
- **Germany:** 5 employees, located at the office of a WPP Group company
- **USA:** 3 employees, located at the office of a WPP Group company

### *Our Supply Chain*

15. We are committed to creating an inclusive, sustainable, ethical and diverse network of business-enabling suppliers.
16. We have a broad range of direct suppliers supporting our day-to-day operations as a professional services provider in Australia and New Zealand. During this reporting period, across all our entities, we procured goods and services from voluminous direct (first-tier) suppliers. 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.
17. Our significant suppliers fall within the following industry categories:
  - media monitoring and market research services;
  - business and management consultants /services;
  - computer and technological products and services;
  - office equipment, stationary and catering;
  - building and office maintenance services;
  - subscription services; and
  - insurance and investment in technology services.
18. The vast majority (5,352) of our direct suppliers are Australian or New Zealand-based entities. The remaining 435 suppliers are located in the following diverse geographies:
  - Canada
  - China;
  - Finland;
  - France;
  - Germany;
  - Hong Kong;
  - India;
  - Ireland;
  - Italy;

- Japan;
- Malaysia;
- New Zealand;
- Papua New Guinea;
- Philippines;
- Romania;
- Singapore;
- South Africa
- Spain;
- Switzerland;
- Thailand;
- United Kingdom;
- USA;
- Vietnam.

19. We have undertaken a risk assessment during the reporting period of all direct suppliers supporting the operations of our business and used our aggregated supplier spend data to map the geographies and sectors in which those direct suppliers operate.

**Part Two: Assessing Risks of Modern Slavery Practices**

1. The nature of our core organisational operations, as professional services providers, means that we have, in relative terms, **a very low operational modern slavery risk profile**. Notwithstanding this, in compliance with the Act, we have undertaken a desk-based risk assessment of our operational supply chain using our aggregated supplier spend data from our 2021 reporting period. Like many organisations in our industry, the risk of modern slavery in our operations lies within the deeper tiers of our supply chain – we recognise that the greatest risk may be from Tier 2 and Tier 3 suppliers in our supply chain (with whom we don't have a direct contractual relationship).

*Supply Chain Risk*

2. The desk-based risk assessment that we have undertaken in this reporting period uses third-party proprietary technology to assess the cumulative modern slavery risk within our supply chains, by assessing the complex interaction between the following factors:
- our total Tier 1 supplier spend amount (i.e. the value of our direct supplier contracts);
  - applying industry categories to that spend, including industries that may, in turn, feed into particular categories further down any supply chain;
  - analysing the geographical area of operation of those Tier 1 suppliers;

and

- seeking to gain insights into any theoretical modern slavery risks within our supply chain beyond our Tier 1 suppliers (i.e. Tier 2, Tier 3 and beyond).
3. A summary of the methodology of the proprietary risk assessment is set out in Appendix 2.
  4. This desk-based risk assessment identified the areas of highest supply chain risk may be concentrated at the **second and third tiers**. This means that there may be a heightened, albeit theoretical, risk of modern slavery within the goods and services that our suppliers procure and, in turn, within the goods and services that their suppliers procure.
  5. It also identified the following industry categories with a potentially elevated, although again theoretical, modern slavery risk. This is largely due to the prevalence of modern slavery in these countries and within the supply chains of the goods and services that businesses operating in these industries procure from:
    - the provision of research services in Thailand;
    - the provision of business consulting services in Malaysia.
  6. Our direct suppliers in these two industry categories operate within the professional services sector. More specifically, in Thailand, these suppliers are primarily professional consulting firms, and in Malaysia, they are primarily consulting firms, Malaysian based subsidiaries of global technology entities, and communications and advertising firms. The operational requirements for these suppliers typically include the procurement of office space, catering, and office supplies that may have an inherent higher risk and greater exposure to modern slavery practices because of their geographical location.
  7. We have also identified that businesses like ours, with a relatively high dependence upon computers and other hardware, may have embedded in their supply chains a reliance upon certain high risk products, particularly electronics /computer hardware inputs. Such products are commonly imported from established hot spots for modern slavery, such as Malaysia and China.
  8. We confirm that we have not received any reports of actual or suspected cases of modern slavery in our supply chain during the reporting period.

#### *Assessed Risks in our Operations*

9. As a professional services provider primarily operating within Australia and New Zealand, we are not operating within a recognised area of high modern slavery risk. However, this does not eliminate modern slavery risks within our direct operations.

10. Our occupation of a total of 59 different physical office spaces across our business provides exposure to well-recognised operational areas of modern slavery in the local context, including in connection with the provision of office cleaning, security, and facilities management services to our local business operations.

#### *Reporting Risks in our Operations*

11. As noted above, we have not received any reports of actual or suspected instances of modern slavery in our operations during the reporting period.
12. We describe below how our people can report concerns and how we continue to monitor for any such issues.
13. 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.
14. 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.
15. All whistleblower reports received by WPP plc's Group Chief Counsel and General Counsel, Corporate Risk, which includes all Right to Speak reports from WPP in Australia and New Zealand, are handled in line with WPP's Whistleblowing and Investigations Protocols. These are logged, investigated and tracked through to a conclusion including any remediation or follow-up actions that might be required.
16. 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 the WPP Group's business integrity team and implemented together with the support and input of the WPP Group's Risk Committees, including the WPP Australia and New Zealand Risk Committee. 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 WPP plc's Audit Committee and the approach and process are reviewed by WPP plc's auditors.
17. 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 are equally committed to preserving the anonymity of an individual who makes a report and does not wish to have their identity revealed.

18. 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.
19. In 2021, WPP plc moved to a new Right to Speak supplier and refreshed all Right to Speak literature and communications, including that used within Australia and New Zealand, focusing in particular on explaining what happens once people have reported and emphasising the importance of speaking up as well as the WPP Group's zero tolerance policy regarding any retaliation.
20. Across the broader WPP Group there has been a steady increase in the number of reports received from whistleblowers over the past few years. Every report received (including from WPP in Australia and New Zealand) is investigated and reported into WPP plc's Audit Committee by WPP's business integrity function. In 2021, WPP plc 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 in relation to WPP in Australia and New Zealand or the broader WPP Group.

### **Part Three: Actions to Address Risks**

1. Our First Statement outlined planned due diligence actions to continually improve our approach to addressing modern slavery issues during this reporting period. These planned actions included:
  - a focus on individual supplier-based due diligence;
  - increasing the number of our direct suppliers that are subject to contractual provisions specifically addressing modern slavery issues; and
  - expanding internal awareness through modern slavery training during new employee induction and increasing existing employee participation.

#### *Supplier Engagement*

2. To obtain greater visibility in relation to our overall supply chains, we selectively issued 50 supplier self-assessment questionnaires to Tier 1 suppliers. The questionnaires were developed to provide greater insight into the practices of our Tier 1 suppliers, including their level of engagement with their Tier 1 suppliers (our Tier 2 suppliers). As part of this process, we targeted certain high risk international suppliers, to help us build a better understanding of our direct international presence, which we had flagged as an action area in our First Statement.
3. We consider the self-assessment questionnaire process to represent an early step in the longer-term, collaborative process of supplier engagement in order to address modern slavery compliance, not an end in itself. Some of the subsequent and connected due diligence that we are committed to undertaking includes:
  - a focus on increasing the number of our direct suppliers who have committed to WPP's modern slavery due diligence standards in Australia and New Zealand.

- implementing a “monitoring” framework to inform our suppliers about whistleblower policies, our right to speak hotlines and the mechanisms for them to raise complaints. We will continue to focus on this in future reporting periods.
- 4. Our Supplier Code of Conduct requires our suppliers to commit to modern slavery related contractual provisions and to have equivalent policies in their organisations to address and respect human rights. Specifically, the modern slavery provisions require suppliers to undertake their own steps to identify, assess, address and mitigate modern slavery risks in their operations and supply chains and in the supply chains of their subcontractors.
- 5. A primary focus during the reporting period has been to facilitate an increase in the number of our direct suppliers who commit to the anti- modern slavery measures and values that are either directly addressed in our Supplier Code of Conduct or align with that Code. As at the time of lodgement, many of those suppliers with whom we have been actively engaging in respect of our Supplier Code of Conduct and our modern slavery contractual clauses have committed to undertaking their own modern slavery assessment and due diligence.
- 6. We begin the dialogue with our suppliers about the requirement to commit to our Supplier Code of Conduct during our onboarding program, to ensure our suppliers are aware of our expectations from the beginning of our commercial relationship.
- 7. As with the supplier self-assessment questionnaires, we view the process of seeking a commitment from new suppliers to our Supplier Code of Conduct as another means to engage on modern slavery issues. This too is an important element of our overall response, because, as identified above, the most concentrated areas of potential modern slavery risk may be in the second and third tiers of our supply chain. By encouraging our Tier 1 suppliers to pursue their own modern slavery risk assessments, we can attempt to influence and target risk factors occurring at the second tier of our supply chain, and potentially beyond.

#### *Internal Education & Training*

- 8. One of the initiatives covered in our First Statement was the development and introduction of a tailored online learning module that provides specialised modern slavery training for our staff.
- 9. A feature of this reporting period has been the successful implementation of that online education module into our onboarding program for all new staff.
- 10. We have continued to roll-out and promote this training program across the organisation during the reporting period, including advising employees of the mandatory nature of the training. Whilst we want to see continuing improvement in the overall level of organisation-wide engagement on modern slavery issues, we see it as a positive sign that internal awareness levels relating to the issue appear to have increased significantly.

#### **Part Four: Measuring Effectiveness**

- 1. We recognise that impactful change is achieved through a process of continual review, an attitude of continuous improvement, and candid self- evaluation of our ongoing modern slavery response.

2. As described in our First Statement, we have implemented and continue to be guided by our Effectiveness Assessment Framework in Australia and New Zealand, which provides metrics for internal assessment in the following key areas:
  - Commitment
  - Traceability and Risk Assessment
  - Purchasing Practices
  - Recruitment
  - Worker Voices
  - Monitoring and Evaluation
3. Our Modern Slavery Working Group, which consists of key members from our legal and procurement teams, has continued to meet regularly over the reporting period to review our progress. A key outcome of this process includes the ongoing refinement of the modern slavery related contractual provisions that we ask our suppliers to commit to.
4. As noted above, we did not receive any reports of actual or suspected modern slavery practices in our supply chains and operations during the reporting period, nor have we been alerted to any instances that would require us to implement our risk mitigation strategy developed in our First Statement. There is still more due diligence to be done in future reporting periods for the areas that we have earmarked as being a potential for high risk exposure.
5. For the next reporting period, we plan to continue to focus on the following key actions:
  - analysing desktop audit responses from those suppliers to whom we have sent our self-assessment questionnaires.
  - connecting with those suppliers who have not yet responded to our self-assessment questionnaire to prompt a response or to understand the reason why no response has been provided.
  - ongoing monitoring: we will look to address any modern slavery risk concerns raised within our business.

#### **Part Five: Consultation with controlled entities & other relevant information**

1. During the reporting period, our procurement team has consulted with all owned and controlled entities to obtain procurement data, to facilitate the assessment of the supply chains of those entities, which has informed our overall risk assessment detailed above at Part Two.
2. Our modern slavery response is uniform across all of our subsidiary entities. The operational activity and core supply chains of all subsidiaries have adopted a streamlined approach for consistency.

**Appendix 1: List of Subsidiaries during the reporting period**

<b>COMPANY</b>	<b>Country of Incorporation / Formation</b>
ABKP Ideaworks Pty Ltd (ii)	Australia
Active Display Group Ltd (ii)	Hong Kong
Active Sites Alive Pty Ltd (renamed WPP Large Format Production Pty Ltd)	Australia
AKQA Limited	New Zealand
AKQA Media Pty Ltd	Australia
AKQA Pty Ltd	Australia
Aktivation Co Ltd	Vietnam
Aleph (Thailand) Co., Ltd	Thailand
Aleph Pte Ltd	Singapore
Badjar Ogilvy Pty Ltd	Australia
Barton Deakin Pty Limited	Australia
Blaze Advertising Pty Ltd	Australia
Boxlink Pty Ltd	Australia
Brand Communications Pty Ltd	Australia
Buchanan Advertising (Australia) Pty Ltd	Australia
Buchanan Advertising (Canada) Inc.	Canada
Buchanan Advertising (Deutsche) GmbH	Germany
Buchanan Advertising (Malaysia) Sdn. Bhd	Malaysia
Buchanan Advertising (UK) Ltd	United Kingdom
Buchanan Advertising (US), LLC	USA
Buchanan Group Holdings Pte Ltd	Singapore
Buchanan Licencing Singapore Pte Ltd	Singapore
Bullseye (Asia Pacific) Pty Ltd (i)	Australia
Burson Cohn & Wolfe Pty Ltd	Australia
Cannings Advisory Services Pty Limited	Australia
Chemistry Media Ltd	New Zealand
Commercial Creativity Limited	New Zealand
Cornwell Design Pty Ltd (i)	Australia
Designworks (NZ) Limited	New Zealand
Dominion Software Developers Limited	New Zealand
DTMillipede Pty Ltd	Australia

eAgency Co Ltd	Vietnam
Edge Asia Digital Services Sdn Bhd	Malaysia
Essence Global Australia Pty Ltd	Australia
Ethnic Communications Pty Ltd	Australia
Evocatif Pty Ltd	Australia
Finance Plus Australia Pty Ltd	Australia
George Patterson Partners Pty Ltd	Australia
GroupM Communications Pty Ltd	Australia
GroupM New Zealand Limited	New Zealand
GTB Australia Pty Ltd	Australia
Hawker Britton Group Pty Ltd	Australia
Heath Wallace Australia Pty Limited	Australia
Hill and Knowlton Australia Pty Ltd	Australia
Hogarth Australia Pty Ltd	Australia
Howorth Communications Pty Limited (ii)	Australia
Human Communications Pty Ltd	Australia
I.M Advertising Pty Limited (iii)	Australia
Ikon Communications (Melbourne) Pty Limited	Australia
IKON Perth Pty Ltd (ii)	Australia
Ikon Communications (NZ) Ltd (iv)	New Zealand
IKON Communications Pty Ltd	Australia
Landor & Fitch Pty Ltd	Australia
L'Atelier Media Pty Ltd	Australia
Life Agency Pty Ltd	Australia
M Media Group Pty Ltd	Australia
Marketing Communications Holdings Australia Pty Ltd	Australia
Markitforce (Melbourne) Pty Ltd	Australia
Markitforce Pty Ltd	Australia
Mayko Trading Pty Ltd	Australia
Mediacom Australia Pty Ltd	Australia
Mindshare New Zealand Limited	New Zealand
Mirum Pty Ltd	Australia
Motivator Media Pty Ltd	Australia
Neo Media Australia Pty Ltd (i)	Australia
New Dialogue Pty Ltd (trading as Tongue) (i)	Australia
O2 Agency Pty Ltd (ii)	Australia
Ogilvy Action 2012 Pty Ltd	Australia

Ogilvy Australia Pty Ltd	Australia
Ogilvy Health Pty Ltd	Australia
Ogilvy International Limited	New Zealand
OgilvyAction Pty Limited	Australia
Ogilvy PR Pty Ltd	Australia
OPR Employee Experience Pty Limited (ii)	Australia
OPR Health Pty Limited (ii)	Australia
Origami PR Pty Ltd (ii)	Australia
Outrider Australia Pty Ltd	Australia
Oxygen Learning Pty Ltd	Australia
Parker & Partners Pty Ltd (ii)	Australia
Picnic Software Pty Ltd	Australia
Play Communications Pty Ltd (i)	Australia
Prism Team Australia Pty Ltd	Australia
Professional Public Relations NZ Holdings Ltd (i) (amalgamated with WPPH NZ)	New Zealand
Professional Public Relations NZ Limited (i) (amalgamated with WPPH NZ)	New Zealand
Professional Public Relations Pty Ltd	Australia
PT Bullseye	Indonesia
PT Eksakta Digital Gemilang	Indonesia
PT STW Group	Indonesia
Pulse Communications Pty Limited (ii)	Australia
Red Tape Commercials Pty Ltd (trading as OgilvyX)	Australia
Research International Australia Pty Ltd	Australia
Salmon Asia Pacific Pty Ltd	Australia
Senior Minds Pty Ltd (trading as Ogilvy Brisbane or Junior)	Australia
Sibling Agency Pty Ltd	Australia
Singleton Ogilvy & Mather (Holdings) Pty Limited	Australia
STW Geometry Holdings Pty Ltd	Australia
STW Group Asia Holdings Pte Ltd	Singapore
STW Media Services Pty Limited	Australia
Sudler & Hennessey Australia Pty Ltd	Australia
The Brand Agency Limited (NZ)	New Zealand
The Brand Agency Limited (UK) (i)	United Kingdom
The Brand Agency Pty Ltd ATF Brand Agency Unit Trust	Australia
The Campaign Palace Pty Ltd (ii)	Australia

The Origin Agency Pty Limited	Australia
The Punch Agency Pty Ltd (iii)	Australia
The Store WPP AUNZ Pty Ltd	Australia
The WTA Group Pty Ltd	Australia
VML Digital Pty Limited	Australia
VMLY&R Limited	New Zealand
VMLY&R Pty Limited	Australia
Wavemaker Australia Pty Ltd	Australia
Wavemaker New Zealand Limited	New Zealand
whiteGREY Pty Ltd	Australia
WPP AUNZ Experiences Pty Ltd (renamed to Maverick Marketing and Communications Pty Ltd) (iii)	Australia
WPP AUNZ GR Pty Ltd	Australia
WPP AUNZ Ltd	Australia
WPP Holdings (Australia) Pty Limited	Australia
WPP Holdings (New Zealand) Limited	New Zealand
WPPAUNZ Analytics Pty Ltd	Australia
WPPAUNZ Solutions Pty Ltd (ii)	Australia
WPPAUNZ Team Red Pty Ltd	Australia
Wunderman Pty Ltd	Australia
Wunderman Thompson NZ Limited Financial & Media Services (NZ) Ltd (i) (amalgamated with Ogilvy International Limited) Heyday Limited (i)	New Zealand
Wunderman Thompson Pty Ltd	Australia
Y&R Group Pty Limited	Australia
Young & Rubicam Group Pty Ltd	Australia

(i) The entity was deregistered during the reporting period.

(ii) The entity filed for deregistration during the reporting period, but the deregistration was not confirmed until 2022.

(iii) WPP AUNZ disposed of all of its interest in the entity during the reporting period.

(iv) The entity was amalgamated out of existence during the reporting period.

## **Appendix 2: Initial Risk Assessment Methodology Summary**

1. As discussed in Part Two of this Statement, we continued our engagement with external subject matter experts to carry out the same comprehensive risk assessment in relation to new supplier categories that were not previously subject to assessment. This baseline exercise provides the basis for our subsequent focus on ongoing due diligence and remediation activities across not only the present reporting period but for the future.
2. Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to seek to gain some insights into theoretical risks that may exist within our supply chain beyond our Tier 1 suppliers.
3. This risk profiling was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 pre-determined industry sectors. This MRIO table is assembled using the following sources:
  - a. The United Nations' (UN) System of National Accounts;
  - b. UN COMTRADE databases;
  - c. Eurostat databases;
  - d. The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
  - e. Numerous National Agencies including the Australian Bureau of Statistics.
4. The MRIO is then examined against the following international standards:
  - a. The UN Guiding Principles on Business and Human Rights;
  - b. The Global Slavery Index;
  - c. International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
  - d. The United States' Reports on International Child Labour and Forced Labour.
5. Our consultant's proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile for WPP in Australia and New Zealand.
6. This high-level, purely theoretical analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act only. It does not confirm the actual existence or non-existence of slavery in our supply chains, operations or investments. Analysis was undertaken at the industry and country level and does not identify any actual suppliers within the theoretical supply chain. It does not account for variances at the entity, region or product level.
7. The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
  - a. The individual suppliers and industries with the most elevated risk of modern slavery;
  - b. Supply chain and investment plots to provide a visual representation of the supply chains for our top 3 first tier industries;
  - c. Plotting the relative modern slavery risk in the supply chain by tier, beyond tier

1;

- d. Geographical depiction of the cumulative risk of modern slavery across the global supply chain;
- e. An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk; and
- f. Identification of categories of suppliers in our supply chains and operations that pose any calculated risks in relation to modern slavery.