

RESPONSIBLE BUSINESS

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

HOW ARE WE DOING?

- 130,000+** employees, freelancers and contractors completed ethics training in 2022
- 250%+** increase in client investments in Black-owned media in first 18 months of GroupM's media inclusion initiative
- GENERATIVE AI** training explores how generative AI can be used and introduces principles to identify and manage the key legal, ethical and privacy risks

IN THIS SECTION

SUSTAINABILITY GOVERNANCE AND MANAGEMENT

How we manage sustainability across the Company, including governance processes and policies

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Our approach, standards and policies for engaging in public policy activity

DATA ETHICS, PRIVACY AND SECURITY

Our expertise, governance, policies and resources on data and emerging technologies, such as Generative AI

OUR SUPPLY NETWORK

Setting and communicating clear supplier standards, and embedding sustainability criteria (including DE&I) within our supplier selection and onboarding process

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Managing human rights and modern slavery risk, and promoting human rights

TAX POLICY

Summary of our tax payments in 2022, as well as our approach to tax planning and transparency

SUSTAINABILITY GOVERNANCE AND MANAGEMENT

Our governance processes and policies help us manage sustainability risks and opportunities consistently across the Company

ROLES AND RESPONSIBILITIES

WPP sets sustainability policy, with every agency responsible for implementation.

The Board is responsible for the overall long-term success of WPP and for setting the Company's purpose, values and culture and strategic direction, including on sustainability.

The Sustainability Committee supports the Board in its oversight of corporate responsibility, sustainability, environmental, social and governance (ESG) and related reputational matters. It reviews and monitors implementation of the Company's sustainability strategy and reviews policy statements on environmental and social matters. The Committee meets a minimum of four times a year. Its remit also includes reviewing major disclosures, including WPP's Modern Slavery Statement, Taskforce on Climate-related Financial Disclosures statement and, in 2023, our Net Zero Transition Plan.

Our Sustainability Committee members bring a wide range of sustainability experience and expertise including marketing, technology, sustainable business and international development, from senior positions in business and non-governmental organisations.

i See pages 3 and 4

The WPP Executive Committee sets the sustainability strategy and oversees the approach across agencies in its implementation, ensuring consistent execution and embedding of the Company's culture and values.

Our Chief Sustainability Officer – a new role created in 2022 – has operational responsibility for sustainability, supported by our group sustainability team.

Progress relies on accountability. Diversity, equity and inclusion goals continue to make up part of senior executives' balanced scorecards, and Executive Directors are assessed against their progress on carbon-reduction targets.

EMBEDDING SUSTAINABILITY IN OUR AGENCIES

We have a clear policy framework through our Code of Business Conduct, Sustainability Policy (updated in January 2022 and reviewed annually by the Sustainability Committee of the Board), Supplier Code of Conduct, Data Privacy and Security Charter, Human Rights Policy Statement and other policies included in the WPP Policy Book. In 2022, we put in place a revised Assignment Acceptance Policy and Framework that subsidiaries need to follow when taking on new business (see page 31). Our agencies are required to comply with our Sustainability Policy and report performance to WPP on an annual basis.

Our sustainability team works to ensure consistent implementation of our standards. In 2022, this included a programme of training covering ESG reporting and controls, our Green Claims Guide, and capability building across central functions and our agencies relating to our net zero strategy.

We have linked the margin of WPP's \$2.5 billion revolving credit facility to specific sustainability measures, an important first milestone in WPP's journey to embed its carbon-reduction targets and broader sustainability commitments into its financing arrangements.

DATA QUALITY

Measuring and monitoring our performance is critical to delivering against our sustainability strategy. Selected ESG metrics are subject to independent limited assurance by PricewaterhouseCoopers LLP ('PwC').

i Read PwC's assurance opinion from page 53

The majority of our data is collated locally, and a common challenge is reconciling inconsistencies in data capture.

Throughout this report, we provide commentary on data quality for other selected ESG metrics.

We are working to improve both data quality and coverage so that over time we are able to seek independent limited assurance over a larger proportion of ESG metrics.

RISK MANAGEMENT

ESG risks are integrated into the Company's risk appetite and tolerance levels as well as its assessment, management and monitoring of principal risks. This includes the business review process, which is part of the Executive Management review stage of the 'Three Lines of Defence' model of risk management. At each Board meeting, the management team presents a business review of each of the operations, including an assessment of the risks in each business and details of any change in the risk profile since the last Board meeting. The business review includes the possibility of winning or losing major business; succession and the addition or loss of a key employee; regulatory changes; sustainability, including risks relating to marketing ethics, privacy, diversity and employment; political instability; and changes in accounting or corporate governance practice.

Our principal risks and uncertainties are set out in detail in the Strategic Report section of our 2022 Annual Report and include risks relating to climate change, cyber and data security and our ability to recruit and retain talented people.

STAKEHOLDER ENGAGEMENT

Dialogue with our stakeholders, including our people, clients and shareholders, 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. The table on page 52 summarises how we engage with our stakeholders on sustainability issues. For more information on our stakeholders, what is important to them and how, as a Company, we engage with them, see pages 22 and 23 of our 2022 Annual Report.

TRANSPARENCY AND TRUST

We set clear standards, policies and procedures to ensure high levels of transparency and trust matching our values throughout our business

OUR CODE OF BUSINESS CONDUCT

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.

It is underpinned by more detailed policies on topics including anti-bribery and corruption (ABC), hospitality and gifts, facilitation payments, the use of third-party advisors, human rights and sustainability. In January 2022, we updated the WPP Sustainability Policy and introduced a new Environment Policy to reflect our climate commitments.

Our people are required to take our online ethics training promptly upon joining and then on an annual basis thereafter. Topics include diversity, human rights, conflicts of interest and avoiding misleading work. For the training period ending in 2022, more than 130,000 employees, freelancers and contractors completed the training.

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.

Part of WPP's Code of Business Conduct is making sure that our people have the confidence to speak up and know how to raise concerns through various channels without fear of retaliation. Our approach to this is described under Whistleblowing on page 88 of our 2022 Annual Report.

MANAGEMENT AND COMPLIANCE

Our Group Chief Counsel oversees our approach to ethics and compliance. Senior managers in all our agencies 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 Board-level Sustainability Committee and Executive Committee provide additional oversight and guidance on any ethical issues that may arise.

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 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 reports through emails, calls, texts and in-person appointments.

Every report received from a whistleblower is investigated and reported to the Audit Committee by WPP's business integrity function. In general, there has been a steady increase in the number of reports received over the past few years, though they fell year-on-year in 2022. In 2020 and 2021 there were particular spikes in numbers reflecting concerns raised and connected with Covid-19 and lockdowns. In 2022, a total of 372 reports were received from whistleblowers (2021: 494; 2020: 408; 2019: 361), 328 of which were through the Right to Speak hotline. The most commonly raised concerns were about respect in the workplace and protection of WPP's assets.

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.

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 the Risk Governance Framework on page 86 and Business Integrity Programme on page 87 of our 2022 Annual Report, 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.

PUBLIC POLICY

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

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, people and wider stakeholders.

Our agencies engaged in public affairs include BCW, FGS Global, and Hill+Knowlton Strategies. The majority of their work takes place in the United States, the UK and the EU, although many clients are multinational businesses operating in many countries.

OUR STANDARDS

Our Code of Business Conduct and 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 agencies and employees at all levels.

Many of our agencies 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 agencies 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 lobbying firms to register the names of clients on whose behalf they contact legislators or executive branch personnel. A number of our agencies are listed on the EU Transparency Register of lobbying activities. Our agencies 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. In 2022, we introduced the revised Assignment Acceptance Policy and Framework and the Green Claims Guide to provide additional guidance to our leaders and people about how to conduct additional due diligence in relation to clients and any work we are asked to undertake.

Our Group Chief Counsel has responsibility for developing and implementing our political activity policy and public reporting procedures. Agency CEOs and CFOs in each country or region are responsible for implementing the Political Activities and Engagement Policy at the local level.

Any third parties conducting political activities on behalf of WPP or its agencies must comply with the policy. Third parties are required to complete the WPP mandatory ethics training or equivalent within their own organisation.

LOBBYING AND POLITICAL ADVOCACY

We occasionally directly contribute to the debate on public policy issues relevant to our business, people and wider stakeholders. For example, we are part of the Race to Zero campaign managed by the United Nations Framework Convention on Climate Change. Karen Blackett OBE, WPP's UK President, served as a non-executive director of the Board of the UK's Cabinet Office from 2019 to 2022.

We also support clients' advocacy on a wide range of issues including LGBTQ+ rights, through both pro bono (including The Reality Flag with the Human Rights Campaign and NYC Says Gay in partnership with the mayor of New York City) and paid work.

Our agencies contribute to public policy debate in areas where they have expertise and a special interest, such as privacy, data protection and AI issues.

WPP agencies 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.

POLITICAL CONTRIBUTIONS

WPP agencies 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's legal function 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 agencies may make personal voluntary political contributions directly to candidates for office.

BCW and FGS Global also maintain political action committees (PACs) which accept voluntary donations from their people to support political candidates. In 2022, these PACs made disbursements worth \$118,912 (data from fec.gov).

MEMBERSHIP OF TRADE ASSOCIATIONS

WPP and our agencies are members of industry groups, business associations and other membership organisations with robust governance processes. We actively support trade associations' initiatives and projects that align with our values and priorities such as Global DEI Census, Ad Net Zero and Global Alliance for Responsible Marketing.

WPP agencies must nominate a senior manager to manage and oversee trade association relationships.

At a WPP level, our memberships include: 30% Club, the American Benefits Council, Business Disability Forum, Business in the Community, CBI, Champions of Change Coalition, China Britain Business Council, Institute of Business Ethics, RE100, UN Global Compact, The Valuable 500, Women on Boards and Partnership for Global LGBTIQ+ Equality.

In our markets, our agencies are often members of local advertising, PR, public affairs and market research industry associations, as well as national chambers of commerce and business councils.

DATA ETHICS, PRIVACY AND SECURITY

INFORMING OUR PEOPLE

Data and artificial intelligence (AI) present huge opportunities for the creative and marketing industry, from content creation to developing code to reducing production time.

As technology evolves, we need to be aware of the potential risks and ensure it is being used and applied appropriately and responsibly, both in our own agencies and on behalf of our clients.

We are developing skilled, knowledgeable teams who are inspired about the potential of data and AI and proud of the extraordinary capabilities that WPP has to offer our clients.

The WPP Demystifying Data & AI Academy is designed to help anyone across WPP understand the latest trends and technologies in data and AI and develop the skills and knowledge they need to navigate them.

Our new Generative AI training, launched in February 2023, explores how the technology can be used and introduces principles to identify and manage the key legal, ethical and privacy risks.

To help business leaders develop the knowledge and skills to lead in the age of AI, we launched an executive diploma in Artificial Intelligence in Business at the University of Oxford Saïd Business School. Thirty students participated in the inaugural class.

The WPP data and AI hub provides practical resources to help stay ahead of new developments. This year we launched tips and principles for the metaverse and generative AI.



From ethics to culture, see WPP's latest thinking on how organisations can effectively and responsibly use data and AI at wpp.com/data-and-ai

SUPPORTING CLIENTS

To help clients understand how best to harness the power of AI as a force for good, we have developed a framework of six types of deployment. These are:

- 1. Task automation:** new technologies have allowed us to carry out tasks better and faster and replace specific tasks with simple algorithms
- 2. Content generation:** also known as 'Generative AI', this category involves the automatic generation of images, videos, text, code and voice
- 3. Human representation:** using technologies such as avatars, deepfakes and natural language models to mimic the behaviour of humans
- 4. Extracting complex insights:** machine learning and advanced analytics to find correlations that humans could not
- 5. Human performance enhancement:** using technology as an extension of ourselves
- 6. Complex decision making:** using AI to make better decisions through expert systems, optimisation or decision trees

By considering technologies in this way, we can identify strengths, ethical concerns, weaknesses, frictions and opportunities. This can help us solve problems better and build a framework for a safe and ethical future for AI.

In February 2023, WPP hosted Stream Metaverse, a new one-day lite Stream event format bringing together clients, partners and WPP specialists to discuss topics including the future of Web3, virtual and augmented reality, cryptocurrency, and inclusivity in the metaverse.

DEVELOPING FUTURE TALENT

Data and AI will power almost every industry of the future, but the UK faces a skills shortage. To help close this gap, WPP launched the Creative Data School to teach essential technical skills to more than 6,000 people aged 10–25 across the UK.

The programme aims to inspire the next generation and build their confidence in data and AI, while equipping them with skills including coding with Python, applications of machine learning, and using data to inform decision-making.

Eligible participants will be invited to apply for work experience and internships at WPP, opening pathways to careers in data and AI in the creative industry and beyond.

PRIVACY AND SECURITY

Through our expertise, governance, policies and direct engagement, we demonstrate that we are a trusted partner for our clients, suppliers and associates.

- The WPP Risk Subcommittee is responsible for reviewing and monitoring the Group's data ethics, privacy and security risk, as well as its approach to regulatory and legal compliance in relation to these
- Our Group Chief Privacy Officer leads our work on privacy, supported by our Global Data Protection Officer. Together, they provide practical guidance and support to our agencies, promote best practices and ensure that privacy risks are well understood
- The WPP Data Privacy and Security Charter sets out core principles for responsible data management through our Data Code of Conduct, our technology, privacy and social media policies, and our security standards (based on ISO 27001)
- Safer Data training, which includes content on data protection, security and privacy, must be completed by all new and current employees, as well as consultants. Throughout the year, agency and subject matter-specific training is provided across WPP agencies and in 2022 included a focus on new data privacy regulations such as the California Privacy Rights Act
- Our privacy teams have established direct relationships with their client counterparts to ensure alignment and engagement
- Choreograph, our data company, epitomises our data philosophy: that clients should own their own data to minimise risk, meet consumer privacy expectations and future-proof their businesses
- Through our active engagement in industry bodies including the Advertising Association in the UK and the 4As and Network Advertising Initiative in the US, we are able to monitor and influence the changing regulatory landscape
- Our annual Data Health Checker provides us with 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. In 2022, the average risk score was 1.6 out of five (2021: 1.6), where five is the maximum score possible and indicates maximum risk

OUR SUPPLY NETWORK

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

The wide range of services we offer and our organisational structure means we have a complex and dynamic supply chain ecosystem to manage. We work with more than 68,000 parent companies across our supply network.

Our suppliers fall into two main categories: those providing goods and services used to run our agencies, such as IT and telecommunications, travel, facilities management, people services and real estate; and those used in client work, such as advertising and marketing services, production and media.

RISK ASSESSMENT

We continually assess supply chain risk based on country, industry sector, categories of goods and services and individual suppliers. This is combined with a pre-engagement supplier due diligence questionnaire covering governance, compliance, sustainability, human rights and labour standards.

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, WPP began an extensive procurement transformation programme to enhance and improve our procurement ecosystem and infrastructure and, as a result, optimise how we buy. We have concluded the roll out of a modern spend analytics tool across all WPP markets and we continue to standardise and enhance numerous processes and systems including those relating to supply risk management, procurement policy compliance, contract lifecycle management (CLM), supplier onboarding and supplier relationship management (SRM).

The programme will ultimately facilitate full life-cycle mapping and traceability across WPP's Tier 1 supplier network. The transformation programme is being led by our Chief Financial Officer and Chief Procurement Officer and, with support from the sustainability team, will implement new controls and processes that are critical to a robust and responsible sourcing programme while also providing support through regular policy training.

In 2023 we will conduct a human rights due diligence exercise. The results will provide further visibility and transparency within our Tier 1 suppliers and help us further refine our risk assessment methodology. Work will also continue to standardise and enhance processes and systems relating to supply risk management, procurement policy compliance, CLM and supplier onboarding and SRM.

SUPPLIER SELECTION

We have established due diligence processes to help us select suppliers that meet our responsible sourcing standards, and we work with them to positively influence the wider supply chain. This reduces risks to our business and clients and enables us to respond to the growing number of client tender processes that include supply chain management criteria.

Contracted suppliers are required to sign WPP's Business Code of Conduct – Supplier Version, confirming they will comply with our standards or adequately demonstrate to WPP that they have the equivalent standards in place within their own business. These standards include 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) and other sustainability issues.

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

WPP also includes a right-to-audit provision in the supplier documentation and/or standard terms and conditions of contract.

SUPPLIER DIVERSITY

We want to build a community of diverse, credible and reliable suppliers to unlock value-adding, innovative and sustainable partnerships. We are committed to including Certified Diverse Suppliers (CDS) in our purchasing lifecycle, both internally and for the benefit of our clients. We define CDS as minority-owned, women-owned, veteran-owned, LGBT-owned, service disabled veteran-owned, historically underutilised businesses and small businesses.

Our supplier diversity programme encourages WPP and our agencies to buy from CDS. In 2022 we expanded our responsible procurement team, refreshed our Supplier Diversity Programme and partnered with a third party to provide improved data for reporting.

Through the Global Supplier Diversity Alliance, with memberships in Australia, the UK and the United States, we have access to global directories of CDS, so we can actively search and include them in our RFPs and client tender responses.

Through the UK chapter, MSDUK, we sponsor the UK's first integrated supply chain accelerator programme to help minority-owned businesses become supply-chain ready. The programme, which aims to create an ecosystem where diverse suppliers and corporates can grow and thrive together, connects Minority Ethnic Businesses with potential clients like WPP. It provides holistic support from expert entrepreneurs on topics from networking and mental resilience to supporting future leaders. In 2022, we provided mentors and ran workshops on topics including user experience.

Media investment is managed by GroupM. GroupM's media inclusion initiative aims to direct investment in, and create opportunities for, diverse media companies and content creators with an initial focus on Black-owned media in the United States. In its first 18 months, the initiative resulted in a 250%+ increase in client investments in Black-owned media.

HUMAN RIGHTS

Respect for human rights is a fundamental principle for WPP. In our business activities we aim to prevent, identify and address negative impacts on human rights and we look for opportunities to promote and support human rights, including children's rights, through our business activities and in areas such as our pro bono work.

WPP agencies must comply with our Human Rights Policy Statement which 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.

In addition, our Sustainability Policy, updated in 2022 and approved by the Board on an annual basis, outlines our positive contribution to society and the environment, underpinned by our responsibility to respect human rights.



To read our Sustainability Policy visit wpp.com/sustainability

We expect our suppliers to adopt human rights standards consistent with our own.

We are a member of the United Nations Global Compact and report progress against its ten principles annually. This report forms part of our eighth annual communication on progress.



To read our reporting standards index visit wpp.com/sustainabilityreport2022

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. As a founding member of the Unstereotype Alliance, we partner with UN Women to work towards eradicating harmful stereotypes from all advertising and media and to drive positive social change.

i Find out more about our work with UN Women, see page 27

Our most direct impact on human rights is as a major employer. People are at the heart of WPP's business and critical to our business success. 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.

We are committed to building a workforce that reflects the societies in which we operate and a culture that is inclusive and one where people feel they belong.

i See people chapter for more information, pages 6 to 15

Human rights are included in the mandatory ethics training completed on joining and then annually by all employees. For the training period ending in 2022, more than 130,000 employees, freelancers and contractors completed the training.

We work with clients to manage any human rights risks from marketing campaigns, for example by protecting children's rights in relation to marketing.

We will not undertake work that is intended to mislead on human rights or any other issue. We always seek to identify the underlying client before taking on work.

MODERN SLAVERY

We do not tolerate any form of modern slavery or human trafficking in any part of 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.

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.

WPP is also committed to working with other businesses and governments to act against modern slavery. In the UK, we continued as a member of the Home Office Business Against Slavery Forum (BASF), which is a platform that helps businesses identify, tackle and prevent slavery in their supply chains and enables us to share intelligence and best practice.

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 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.

In 2022, a total of 372 reports were received from whistleblowers (see page 41). All reports were followed up, investigated where appropriate by our business integrity team, and reported to the Audit Committee. None of these reports was linked to concerns of human rights or modern slavery.



To read our Modern Slavery Act Transparency Statement, visit wpp.com/sustainability/modern-slavery-act-statement

TAX POLICY

TAX PAYMENTS IN 2022

The Group paid corporation and overseas taxes of £391 million in 2022 (2021: £391 million). Estimated social security taxes collected and paid during 2022 were £1,104 million (2021: £970 million). Other taxes (primarily property taxes) paid during 2022 were £36 million (2021: £38 million).

We are working to quantify the wider economic impacts of our business and the benefits associated with our activities, including tax payments to governments.

GOVERNANCE

Responsibility for tax strategy, the supporting governance framework and management of tax risk ultimately sits with the Chief Financial Officer (CFO). Day-to-day responsibility for each of these areas sits with the Group Tax Director, who reports to the CFO.

The Audit Committee, which is made up of Independent Non-Executive Directors, reviews the Group's tax strategy annually. It is supported by a tax risk management strategy, which aligns our monitoring and reporting of tax risks and controls with our policies for other risks and controls. Key risks and issues related to tax are escalated to and considered by the CFO throughout the year, and the Audit Committee (and if appropriate the full Board) on at least an annual basis.

We disclose our UK Tax Strategy in our 2022 Annual Report and key elements are summarised below.

MANAGING TAX RISK

As a large multinational group with operations globally, the Group is exposed to a variety of tax risks. These can be grouped under the following headings:

1. Tax compliance and reporting risks

which cover risks associated with compliance failures such as submission of late or inaccurate returns, the failure to submit claims and elections on time or where finance or operational systems and processes are not sufficiently robust to support tax compliance and reporting requirements

2. Transactional risks which arise where transactions are carried out or actions are taken without appropriate consideration of the potential tax consequences or where advice taken is not correctly implemented

3. Reputational risks which looks beyond financial risks to the wider impact tax risk may have on our relationships with our stakeholders, including shareholders, clients, tax authorities and the general public

WPP Tax is made up of a team of tax professionals based predominantly in London and New York. In addition to an oversight role, they provide advice on tax-related issues, undertake or assist with tax filings, manage relationships with tax authorities and assist with various forms of tax and financial reporting.

Where appropriate, we look to engage with tax authorities to disclose and resolve issues, risks and uncertain tax positions. The subjective nature of many tax rules does however mean that it is often impossible to mitigate all known tax risk. Indeed, in certain situations, an element of tax risk may be maintained, where we believe our approach is consistent with the principles set out in our tax strategy and where the range of potential outcomes is in accordance with our risk parameters. Thus, at any given time, the Group may be exposed to some risk arising from its tax affairs, although one of the key responsibilities of WPP Tax is to manage and mitigate tax risk wherever possible.

TAX COMPLIANCE AND RELATIONSHIP WITH TAX AUTHORITIES

We are committed to complying with our tax filing, reporting, payment and disclosure obligations globally.

We look to maintain open and transparent relationships with the tax authorities in the jurisdictions in which we operate. This may take the form of discussing key developments in our business and the potential impacts of those developments. Equally, it may involve disclosing and seeking to resolve a known issue prior to the filing of the relevant tax return.

From time to time, our views (and those of our advisors) on the appropriate tax treatment in any given case may differ from those of the tax authorities. Where such circumstances arise, we will work constructively and proactively with the tax authorities in question with a view to achieving an early resolution to any matters arising.

TAX PLANNING

We will not engage in artificial transactions, the sole purpose of which is to reduce tax.

We enter into transactions or arrangements on the basis that they have the substance required by law, as well as a business, commercial or other non-tax purpose. We will not enter into transactions with the purpose of securing a tax advantage clearly and unambiguously contrary to the relevant legislation.

External tax advice is sought in relation to areas of complexity or uncertainty to support our work in complying with our tax strategy.

We will not enter into transactions or arrangements unless they are consistent with our tax strategy.

Our tax policy requires that, where tax law is unclear or subject to interpretation, we take external tax advice and any adopted tax position is at least probable to apply.

TRANSPARENCY

We support initiatives to improve international transparency on taxation matters, including OECD measures on country-by-country reporting and automatic exchange of information.

We do not tolerate tax evasion, nor do we tolerate the facilitation of tax evasion by any person(s) acting on our behalf.

WOMAN CORP

Fighting for women's rights in the United States

OFFER
COMMUNICATIONS

AGENCY
OGILVY, BCW, GROUPEM

CLIENT
ERA COALITION

In the United States, women still don't have equal rights to men. In fact, corporations are given more legal rights under the constitution than women are. Despite 100 years of marching and protesting, and 50 years since the initial passage of the Equal Rights Amendment, the amendment has never been published.

To support the Equal Rights Amendment (ERA) Coalition Ogilvy, with support from BCW and GroupM, created Woman Corp, a fully incorporated company with rights under the United States constitution to highlight the issue and inspire a new generation to take action.

Ahead of the mid-term elections, Woman Corp campaigned for people to politically engage through their members of congress, donations, and sharing on social media. People were invited to join the staff of Woman Corp on LinkedIn by adding it to their work experience. The corporation is supported by a prestigious Board of Directors including Congresswoman Carolyn Maloney, renowned trial lawyer Benjamin Crump, actresses Gabriella Pizzolo and Julianne Moore, and Ogilvy's global CEO Devika Bulchandani.

Press helped spread the word, calling the campaign 'bold', 'absurdist' and 'important' – while influencers shared content that resulted in 1.6 million views, over 350,000 likes and almost 3,000 comments.

Through Woman Corp, the ERA Coalition hopes to empower Americans to continue to fight this extensive inequality and mobilise congress to pass legislation to affirm the Equal Rights Amendment is part of the constitution.

\$220k
in donated media

22.5m
online impressions

