



## WPP MODERN SLAVERY STATEMENT 2023

The following statement has been prepared in fulfilment of WPP plc ("WPP") and its subsidiaries obligations under the Modern Slavery Act 2015. This statement covers the financial year 2023 and describes our commitment and steps taken to mitigate modern slavery in our business and supply chain.

### ABOUT US

*WPP is the creative transformation company. We provide marketing communications services that help brands grow and transform their businesses and aim to use the power of creativity to build better futures for our people, planet, clients and communities. Our work spans the full marketing spectrum, from advertising campaigns, social media management and influencer marketing to commerce solutions, app development, CRM implementation and more.*

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

We know that modern slavery exists in almost every country in the world. An estimated 28 million people were in forced labour in 2021, and more than \$450 billion of goods imported into the G20 were at risk of modern slavery, according to the latest [Global Slavery Index](#). Modern slavery risk (both forced labour and forced marriage) is on the rise, driven by increased armed conflict, environmental degradation linked to climate change and the ongoing social and economic impacts of the Covid-19 pandemic. These factors have disrupted education and employment and driven a rise in forced and unsafe migration and extreme poverty.

We recognise the role that our business has to play in combatting exploitative labour practices from our operations and supply chain.

The work we do for our clients has the power to bring about change – it regularly changes attitudes, opinions and the way people behave. It is critical that these changes are for the better and we are committed to maintaining the highest standards of honesty and integrity, and acting ethically in all aspects of our business.

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

GroupM, WPP's media investment agency, places over \$60 billion of advertising in the media each year. GroupM is a member of Global Alliance for Responsible Media (GARM), a cross-industry initiative established by the World Federation of Advertisers to address the challenge of harmful content on digital media platforms and its monetization via advertising.

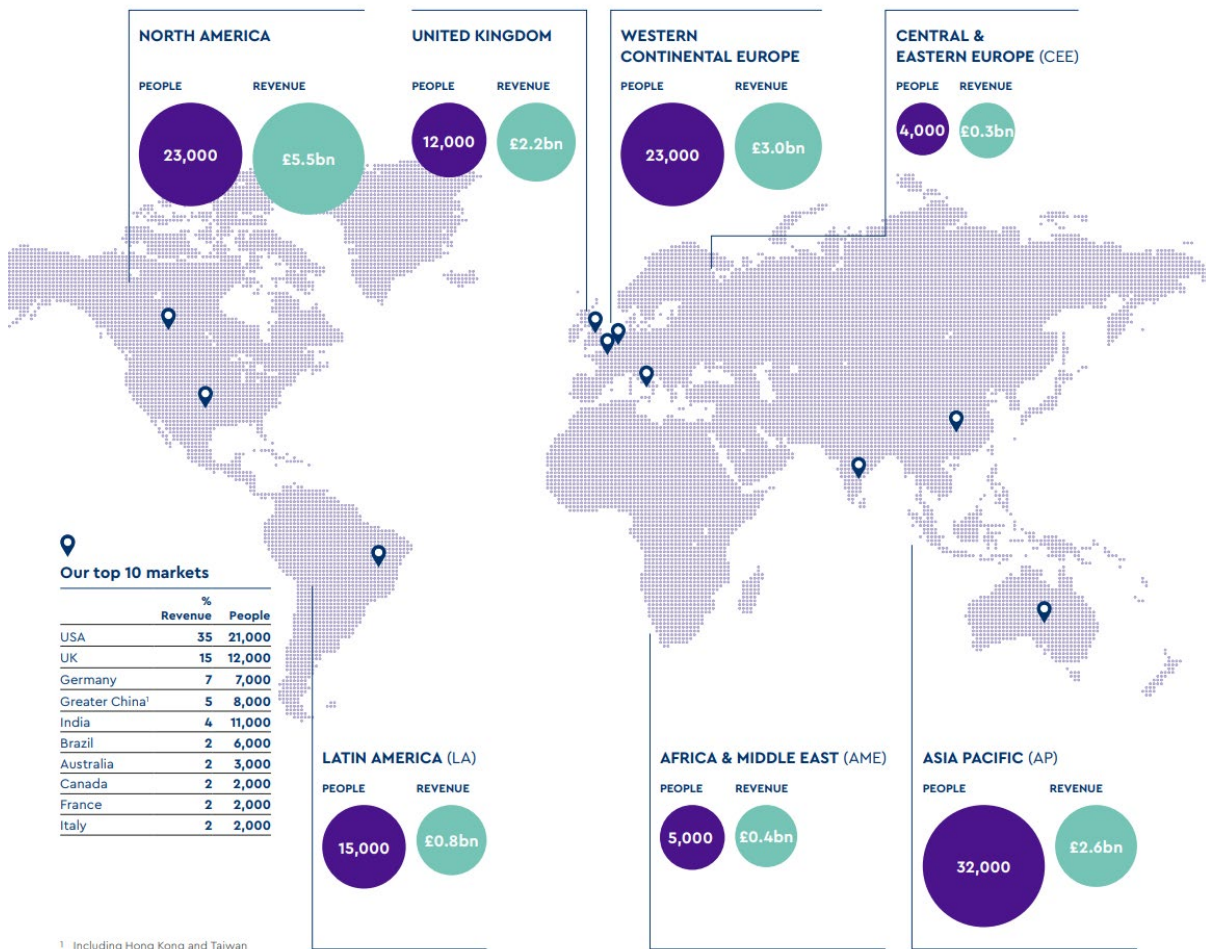
We also provide pro bono creative services to organisations working on human rights, health, education, arts and the environment, and negotiate free media space for charity

campaigns, enabling them to reach a wide audience. Find out more information about our business [here](#).

## OUR OPERATIONS

WPP and our agencies employ 114,000 people in over 100 countries across the globe and work with clients including 303 of the Fortune Global 500. WPP is headquartered in London and is listed on the London Stock Exchange and NYSE.

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



Following a desk-based risk assessment of WPP's direct operations we have noted that WPP has a physical presence and business operations in regions at 'high risk' of modern slavery<sup>1</sup>. However, we consider the risk of our direct employees – as skilled professionals within the advertising, marketing and communications services sector – being victims of modern slavery is low.

<sup>1</sup> Global Estimates of Modern Slavery, ILO, Walk Free and IOM, 2022

## OUR SUPPLY CHAIN

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

Due to the organisational structure of the business and wide range of services on offer, we have a complex and dynamic supply chain ecosystem to manage. We work with more than 60,000 parent companies across our supply network.

Our suppliers fall into two main categories: those providing goods and services used to run our companies – indirect categories of spend such as IT and telecommunications, travel, facilities management, people services, professional services and real estate; and those used in client work – direct categories of spend such as advertising & 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.

We continue to enhance and improve our procurement ecosystem and infrastructure through an extensive procurement transformation programme to optimise how we buy. Led by our Chief Financial Officer and Chief Procurement Officer, the programme, once complete, will facilitate full life-cycle mapping and traceability across WPP's Tier 1 supplier network.

As part of this programme, in 2023:

- We launched a new Supply Risk Management Framework, a more efficient and effective methodology to identify, assess, and prioritise a broad spectrum of risks within our indirect category supply chains. With the aid of this framework, we are better equipped to develop and implement efficient and effective risk management plans.
- We overhauled and improved our Procurement Policy and our Supplier Due Diligence Processes, leading to a more standardised and consistent approach to upfront supplier risk assessment.
- We partnered with SlaveCheck (see box, below) to strengthen how we identify and manage modern slavery risk in our indirect supply chain.
- We commenced a human rights due diligence exercise across selected indirect procurement category value chains at higher risk of potential exposure to human rights infringements. The results of this due diligence exercise will provide greater visibility and transparency across our Tier 1 suppliers. These insights will help us to refine our risk assessment and management methodology, strengthening and, if necessary, adding to our current human rights safeguards and mitigation efforts.

We continue to standardise and enhance numerous processes and systems, including those around supply risk management, procurement policy compliance, contract lifecycle management (CLM) and supplier onboarding and supplier relationship management (SRM). And we will implement new controls and processes that are critical to a robust

and responsible sourcing programme, while also providing support through regular policy training.

### ***Harnessing 'collective intelligence' to identify risk***

*To further strengthen how we identify and manage modern slavery risk in our indirect supply chain, WPP has partnered with SlaveCheck, a profit-for-purpose organisation who identify and flag any potential slavery risks or incidences within global supply chains. We believe that given the depth, complexity and global reach of our supply chains, this tool – which we will pilot in 2024 – will aid us in identifying the higher risk areas in our supply chains, resulting in a more focused and effective approach to prevention efforts.*

## **DUE DILIGENCE IN OUR SUPPLY NETWORK**

Suppliers are asked to sign a copy of WPP's Code of Business Conduct or prove equivalence within their own policies as a pre-condition to engagement, to confirm they will comply with its principles.

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 Business 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.

In addition to signing up to our Code of Business Conduct, WPP suppliers are also required to complete an on boarding questionnaire which includes specific questions pertaining to modern slavery practices.

WPP includes a "right-to-audit" provision in the supplier documentation and / or standard terms and conditions of contract. Our global Supplier Agreement includes a clause relating to modern slavery compliance. WPP reserves the right to terminate its contract with any supplier found to breach or fail to comply with any legislation relating to modern slavery.

## OUR POLICIES

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

As a member of the United Nations Global Compact, WPP views this as an essential component of our obligations to support the basic human rights of our people and their families, including the right to fair conditions of work, freedom from forced labour and child labour. We outline this commitment and set clear ethical standards for our people and companies through our policy framework.

**Our Code of Business Conduct** outlines how we are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity. We specifically reference the Modern Slavery Act to highlight how seriously we take this issue. All our people are required to uphold our Code of Business Conduct, which is available in multiple languages.

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

**Our Code of Business Conduct – Supplier Version** sets out our expectations of suppliers and is based on the WPP Code that applies to all our companies and people. The supplier version includes requirements for labour practices (such as anti-harassment and discrimination, and health and safety), human rights (including no child, forced or bonded labour), and social impacts (such as anti-bribery and corruption) as well as other sustainability issues. It is available in nine languages.

WPP's Code of Business Conduct is set within a wider ethical framework, which includes our Human Rights Policy.

**Our Human Rights policy** reflects international standards and principles including the International Bill of Human Rights, the UN's Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Children's Rights and Business Principles.

**Our Sustainability Policy** is reviewed and approved by the Board on an annual basis and outlines our positive contribution to society and the environment underpinned by our responsibility to respect human rights. It is complemented by our Environment Policy to reflect our climate commitments.

**Our Procurement Policy** outlines a clear procedure for responsible procurement. This includes the provision that, wherever possible, our companies should use centrally negotiated contracts with approved suppliers for commonly purchased goods and services. Regardless, anyone who buys goods and services in any WPP company should consider sustainability risks and criteria to determine whether suppliers are fit for purpose.

**Our talent policies** set out our core principles for responsible recruitment and people management as part of our responsibility to treat our employees with dignity and respect.

As such, we are a living wage employer accredited by the Living Wage Foundation. This means that WPP and all our UK companies pay no less than the voluntary living wage to our people and all on-site contractors such as cleaning, security and catering staff in the UK. This exceeds the UK's statutory national living wage.

## WHERE WE ARE NOW

- WPP is a dynamic group with ever-evolving business operations and we recognise that there are always improvements that can be made to the way we work. To ensure that our policies are kept up-to-date and compliant with international and national regulatory frameworks we conduct regular reviews.
- Our sustainability policy is reviewed and approved by the Board on an annual basis, most recently in January 2024.
- Our Procurement Policy was updated in 2023 and provides a clear set of rules and documentation for supplier engagement.
- The application of our policies and procedures is monitored within each agency and by the internal audit, legal, business integrity and risk and controls functions. Breaches are investigated by our legal and business integrity teams and, where appropriate, external advisors.

## GOVERNANCE

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

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

The Board, assisted by the Audit Committee, has oversight and responsibility for our approach to risk management, which is structured through our three lines of defence model and driven by our risk governance framework, business integrity programme, culture based upon the principles set out in our Code of Business Conduct, and our internal control framework.

For more information about our Risk Governance Framework and Business Integrity Programme please see our 2023 Annual Report, from page 93.

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

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

Our Code of Business Conduct applies to everyone at WPP. It sets out our responsibilities to our people, partners and shareholders to act ethically, legally and with integrity. Senior



managers in all our agencies must certify each year that they have complied and will continue to comply with the Code.

### **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 93 and Business Integrity Programme on page 94 of our 2023 Annual Report, we want to champion and facilitate a culture where our people feel that acting with transparency, 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.*

### **REMEDIATION**

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.

### **RISK IMPACT FROM WHISTLEBLOWER REPORTS 2023**

Every report received from a whistleblower is handled in line with WPP's Whistleblowing and Investigations Protocols and logged, investigated and tracked through to a conclusion including any remediation or follow-up actions that might be required.

Every report received from a whistleblower is investigated and reported into the Audit Committee by WPP's business integrity function.

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

The nature of each report, action taken and outcome is reported to the Audit Committee.

WPP is committed to providing a safe and confidential way for people with genuine concerns to raise them, and to do so without fear of reprisals. WPP does not tolerate any retaliatory behaviour against individuals reporting concerns and is equally committed to preserving the anonymity of an individual who makes a report and does not wish to have their identity revealed. The consequences of misconduct or retaliation range from individual performance management, training for a business or an office and one-on-one training or coaching for an individual through to staff relocation and staff dismissal.

#### WHERE WE ARE NOW

- In 2023, a total of 612 reports were received from whistleblowers. All reports were followed up, investigated where appropriate by our business integrity team, and reported to the Audit Committee. None of these reports were linked to human rights concerns or modern slavery. The most commonly raised concerns were about respect in the workplace and protection of WPP's assets.

#### WPP AUNZ

*In line with the Australian Modern Slavery Act 2018, WPP AUNZ has outlined its own modern slavery risk assessment process in its fourth Modern Slavery Statement. The Statement addresses the Act's mandatory reporting criteria, including the continued identification of modern slavery risks in its operations and supply chains and actions undertaken to address and mitigate these risks. For more information, read their Modern Slavery Statement available [here](#).*

*In 2023 WPP AUNZ completed its 'Reflect' Reconciliation Action Plan (RAP), which outlined a total commitment towards a more diverse, equitable and inclusive future. The plan, which was formally endorsed by Reconciliation Australia, paid respect to the rich culture of Aboriginal and Torres Strait Islander peoples. It enabled us to deepen our understanding of the unique contributions WPP can make to the five dimensions of reconciliation: race relations; equality and equity; institutional integrity; unity; and historical acceptance. As part of this, during 2023 WPP sponsored the interactive, state-of-the-art 'Burra Learning Place' at the Australian Museum, and took an affirmative stance on The Voice referendum. At the end of 2023, we submitted our second 'Innovate' Reconciliation Action Plan to Reconciliation Australia for endorsement, which outlines actions for furthering our reconciliation efforts.*

*Download the Reflect Reconciliation Action Plan [here](#).*



## **TRAINING AND AWARENESS**

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

WPP has also issued guidance and training materials on modern slavery for our businesses to communicate to relevant people in their operations, such as HR Directors. In 2023, our global procurement team developed and launched a new mandatory Modern Slavery training module, which all WPP procurement employees successfully completed. The training covers the basic principles of the Modern Slavery Act 2015 and explains what modern slavery encompasses, how to assess risk in different aspects of our business and supply chain, our key policies, and our remediation process.

## **COLLABORATION**

WPP is committed to working with other businesses and governments to act against modern slavery.

Recognising that advertising production includes suppliers from high-risk sectors (such as support services such as catering, security and construction) we have joined the TV Industry and Human Rights Forum (TVIHRF) as an observing party. The TVIHRF are committed to identifying and tackling exploitation in collaboration with the broadcasting and production industry more broadly. We are exploring how to extend collaboration and apply learnings from the TVIHRF working groups to the advertising production industry.

## **WHERE WE ARE NOW**

- For the training period 2023-2024, more than 100,000 employees, freelancers and contractors completed online ethics training.
- We commenced a refresh our ethics training, including an update to the sustainability module which covers human rights and modern slavery. This activity will be finalised in 2024.
- All members of our global procurement team successfully completed refreshed mandatory Modern Slavery and Human Rights training. New team members will complete the training as part of their induction.

## MAPPING OUR PROGRESS

	<b>In 2022 we stated that:</b>	<b>Progress to date:</b>	<b>Next steps:</b>
<b>Identifying and managing the risk of modern slavery</b>	<p>In 2022, we concluded the roll out of a modern spend analytics tool across the majority of WPP markets.</p> <p>During 2022 the procurement team went through a transformation programme; there are now clearly defined category teams working towards in depth analysis of the supplier landscape with a view to completing that review in 2023.</p>	<p>New Supply Risk Management Framework launched: a more efficient and effective risk assessment methodology.</p> <p>Human rights due diligence exercise commenced.</p> <p>Overhauled and improved Procurement Policy and Supplier Due Diligence Processes.</p>	<p>In 2024, we will roll out a new Source to Contract IT Platform, intended to automate, standardise and streamline many of our currently manual procurement processes and systems relating to supply risk management, procurement policy compliance, contract lifecycle management and supplier onboarding and supplier relationship management.</p>
<b>Awareness and training</b>	<p>In 2022, we undertook to launch a refresher training module on Modern Slavery and Human Rights for the Global Procurement team and refresh our ethics training, including an update to the sustainability module which covers human rights &amp; modern slavery.</p>	<p>Mandatory modern slavery training introduced for group procurement and completed by all team members in 2023.</p>	<p>As part of the onboarding process new joiners will undertake mandatory modern slavery training, with periodic refresher training for the procurement team.</p>
<b>Monitoring</b>	<p>Right to speak: In 2022, we reviewed and followed up concerns received through our Right to Speak facility. We received a total of 372 whistleblower reports, none of which identified modern slavery.</p>	<p>Right to speak: In 2023, we reviewed and followed up concerns received through our Right to Speak facility. We received a total of 612 whistleblower reports, none of which identified modern slavery.</p>	<p>Ongoing monitoring: We will continue to address concerns received from stakeholders.</p>

**Approved by the Board on 8 May 2024**

**Signed:**

**Mark Read**  
**Chief Executive Officer**  
**WPP plc**