

MODERN SLAVERY STATEMENT 2019

This is WPP plc's Modern Slavery Act statement, following the Modern Slavery Act 2015. It covers the financial year 2018/19 and describes our commitment and steps taken to prevent modern slavery in our business and supply chain.

ABOUT US

WPP is a creative transformation company. We build better futures for our clients through an integrated offer of communications, experience, commerce and technology. Our capabilities in advertising, branding and identity, content, media investment, public relations and public affairs, and healthcare give us unmatched breadth and depth in the world of communications.

In line with UK and international law, WPP respects human rights and does not tolerate any form of modern slavery or human trafficking in any part of our business. We are a member of the United Nations Global Compact and report progress against its 10 principles annually.

We support clients to create brands with purpose and to integrate sustainability into their strategies, communications and marketing. The work we do for clients reaches billions of people each year, so to ensure our influence is positive we help manage any human rights risks arising from clients' marketing campaigns.

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.

T-SHIRTS THAT FIGHT SLAVERY

Slavery is a reality in Brazil, despite being illegal. Launched BY H+K Sao Paulo #SomosLivres invites Brazilians to fight to protect this law. Leading fashion journalists and trendsetters received branded t-shirts during Fashion Week.

Results:

- 17m people reached via print and digital media
- 140,000 mentions

(Results achieved November 2018- January 2019)



AT A GLANCE

We:

- revised our central procurement policy which now embeds more specific sustainability criteria and due diligence requirements in the supplier selection process;
- provided Skype training delivered by the WPP sustainability team to WPP Group Procurement teams worldwide, and made the training materials available on our intranet;
- used feedback received from stakeholders and external experts to revise our Modern Slavery Act statement; and
- are taking part in the Business Against Slavery Forum, an initiative between the business community and the UK Government's Home Office.

ORGANISATIONAL STRUCTURE

WPP is a global company. Through our businesses we employ more than 200,000 people (including associates) working in 3,000 offices in 112 countries.

WPP plc employs approximately 400 people in offices in London, New York, Beijing, Shanghai, Tokyo and Sao Paulo.

Our people as skilled professionals are not from vulnerable groups where slavery is a risk and our talent policies set out our core principles for people management.

OUR SUPPLY CHAINS

We work with over 130,000 companies across our supply chain and aim to select suppliers who meet high standards in areas such as human rights and the environment. Our suppliers fall into two main categories: those providing goods and services that we use to run our companies, such as IT, travel, telecommunications, professional services and facilities; and those providing services used in client work, such as advertising production and market research.

Our global procurement team manages centrally negotiated contracts with preferred suppliers. The majority of procurement is through contracts that are negotiated by budget holders within our companies. Our Responsible Sourcing Standards set out how we expect our companies to buy responsibly, and our sustainability team helps them to implement them consistently. Our expectations of suppliers are set out in the [Supplier Code of Conduct](#), which is based on the WPP's [Code](#) that applies to all companies and people.



IDENTIFYING AND MANAGING THE RISK OF MODERN SLAVERY

OUR POLICIES

We do not tolerate any form of modern slavery or human trafficking in any part of our business. We outline this commitment and set clear ethical standards for our people and companies through our policy framework. The main element of this framework is our [Human Rights Policy](#), which 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 commitment is also reflected in our Codes of Business Conduct for our people and suppliers and our [Sustainability Policy](#), which are all available in multiple languages.

All key policies, codes, and information about our approach are available to existing and potential suppliers on our [website](#).

We communicate our policy framework to our companies via the intranet, newsletters, eLearning, onsite training and emails. We have established governance processes and policies to help us manage sustainability risks and opportunities consistently across the company.

Our Group Chief Counsel and Head of Sustainability oversees our policy framework as part of our approach to ethics and compliance. We ask suppliers and senior managers in all our companies to sign a copy of the WPP Code of Business Conduct each year, to confirm they will comply with its principles. The WPP legal and internal audit teams investigate all alleged and confirmed breaches of our Code.

THIS YEAR

In late 2018, we revised our Central Procurement Policy and, to strengthen our sustainability due diligence, in 2019 we launched two new supplier questionnaires in multiple languages. The first is a pre-selection questionnaire for use with potential suppliers. It assesses compliance with our expectations of suppliers in areas such as legal compliance, labour and human rights practices, environment and supply chain management. The second, more detailed information request, will help us to monitor the current practices in our supply chain and work with suppliers to address gaps and risk areas. We have published a guide to completing and evaluating the supplier questionnaires on our intranet.



DUE DILIGENCE IN OUR BUSINESS AND OUR SUPPLY CHAIN

Our Supplier Code of Conduct 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 or modern slavery), and social impacts (such as anti-bribery and corruption) as well as other sustainability issues. Supplier partners must read and sign the WPP Supplier Code of Conduct, confirming that they will comply with our standards. We also include a “right to audit” clause in our purchase orders.

We require our companies to use centrally negotiated contracts with preferred suppliers for commonly purchased goods and services, whenever possible. In addition, our procurement policy requires that anyone who buys goods and services in any WPP company considers sustainability risks and criteria to determine whether suppliers are fit for purpose. Our sustainability team is working with our companies to ensure they take a consistent approach to implementing our policy framework on responsible sourcing.

The revised WPP procurement policy and supplier questionnaires will be used throughout 2019 to strengthen our due diligence on sustainability issues. The data generated will help us determine the focus of our supplier engagement strategy.

We conducted an internal risk assessment on WPP plc company operations by evaluating office location and size, type of labour and business operations in each country. As these operations employ skilled professionals and rarely hire from vulnerable/at-risk groups, we concluded that the risk of trafficking or slavery is very low.

We also assessed the risk of modern slavery among the preferred suppliers managed by our Global Procurement Team, across nine categories of spend. To do this, we evaluated risk and spend within each category. This revealed that almost 90% of our spend is in medium- or low-risk categories such as professional services. We identified facilities and promotional goods as at high-risk. In early 2018 we piloted the new supplier questionnaires with those two categories, in the UK, Asia Pacific and South America. This informed the review of the questionnaires now included in our Central Procurement Policy and content of our training.

For our country risk evaluation, we referred to Maplecroft’s Global Modern Slavery Risk Index. that 94% of our spend with approved suppliers is in countries deemed medium- or low-risk according to the Index. For promotional goods, a high-risk category sourced from high-risk countries, we assessed not only approved suppliers but also additional suppliers managed by our companies.



THIS YEAR

We continued to assess our operations and supply chain to further our understanding of modern slavery risks. This process identified some areas for further investigation and we plan to continue to develop our approach.

For all preferred suppliers, the global procurement team that manages them carries out due diligence on sustainability issues. In spring 2019, the team integrated out new supplier sustainability questionnaire into the supplier registration process. All new suppliers in 2019 and any with contracts due for renewal will complete the new process. Any suppliers with contracts beyond 2019 can complete the process, including the questionnaire, on a voluntary basis.

The data the sustainability questionnaires generate is informing our strategy and approach to managing modern slavery risks.

In early 2019, we started working with our companies operating in countries with a high risk of modern slavery to evaluate their labour and procurement practices both in. This assessment covers 15 WPP companies in over 30 countries.

We supported our companies to meet the requirements of the UK Modern Slavery Act, following the UK Government guidance on reporting requirements for groups with parent and subsidiary organisations.

TRAINING

We update our online ethics training, How We Behave, every two-to-three years. Our people take the mandatory training on joining and repeat it on a regular basis, including after each update. Topics covered include diversity, human rights, conflicts of interest and avoiding misleading work. In 2018, we added unconscious bias training, and updated our ethics and anti-bribery and corruption training. Over 115,000 people have completed the training since this update.

THIS YEAR

We conducted training sessions with our global procurement team on the risks of modern slavery within our business and supply chain.

We also issued guidance and training materials on modern slavery for our businesses to communicate to relevant people in their operations. 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 reporting mechanism.



MONITORING

We have Human Resource, Legal, Compliance and Internal Audit teams dedicated to ensuring compliance with law, policy and process across the business, including all those aiming to prevent modern slavery. We review our policies and procedures on a regular basis.

The Board, assisted by the Audit Committee, has overall responsibility for our internal control and risk management system.

The Nomination and Governance Committee has responsibility for sustainability issues and is establishing Risk Committees across our businesses during 2019 to monitor risk, compliance and business integrity across our markets. Both modern slavery and supply chain integrity form part of the remit of these Risk Committees.

Our people and suppliers can report concerns or suspected cases of misconduct in confidence through our third party-managed Right to Speak facility, which is overseen by our legal and compliance departments.

We relaunched Right to Speak following the appointment of our new CEO in 2018, to ensure all our people know how to raise concerns. There were 200 reports (2017: 106) made via Right to Speak during 2018; all were followed up, investigated where appropriate and reported to the Audit Committee, and none identified modern slavery as a concern.

THIS YEAR

Beginning in 2019, the Sustainability Team is working with our internal audit function to further embed the assessment, management and control of sustainability risks into their work.

OUR PROGRESS SO FAR AND NEXT STEPS

<i>Modern Slavery KPIs</i>	<i>Our Progress</i>	<i>Next Steps</i>
Identifying and Managing the Risk of Modern Slavery	<ul style="list-style-type: none"> To improve our policies and supply chain management we: <ul style="list-style-type: none"> - revised our central procurement policy - strengthened our sustainability due diligence by launching two new supplier questionnaires To further our understanding of modern slavery risks we: <ul style="list-style-type: none"> - launched a new on-boarding tool with sustainability requirements for preferred suppliers managed by our Global Procurement Team, - which we applied to all (100%) new suppliers and communicated to all existing suppliers (100%) with contracts beyond 2019 	<ul style="list-style-type: none"> We will complete the roll out of the sustainability due diligence requirements across our operations We will collect and analyse data on the sustainability responses from suppliers quarterly We will continue to assess and improve our understanding of risk and due diligence approaches
Awareness and Training	<ul style="list-style-type: none"> To deliver awareness and training on modern slavery to WPP and our operating companies we: <ul style="list-style-type: none"> - trained our worldwide Group Procurement team and - issued guidance and training materials to our operating companies 	<ul style="list-style-type: none"> We will continue to extend awareness and training to people with relevant responsibilities within our operations
Monitoring	<ul style="list-style-type: none"> To monitor the risk of modern slavery we: <ul style="list-style-type: none"> - reviewed and followed up concerns received through our Right to Speak facility. We received and reviewed 200 calls; none of which identified modern slavery as a concern 	<ul style="list-style-type: none"> We will continue to address concerns received from stakeholders

We regularly review and refine our policies and procedures for ensuring ethics, compliance and respect for human rights. We will continue to expand and extend the work we do in our sustainability programme to our operating companies as part of our efforts to ensure there is no forced labour or human trafficking within our global operations or supply chains.

We will work closely with our clients, suppliers and industry partnerships to raise awareness about human rights and modern slavery.

Approved by the Board on 12th June 2019

Signed:

Mark Read

Chief Executive Officer