



Modern Slavery Statement 2018

About Us

WPP is the world leader in communications services. The Group provides a comprehensive range of services including digital, ecommerce and shopper marketing; advertising & media investment management; data investment management; public relations & public affairs; brand consulting; health & wellness communications; and specialist communications.

Organisational Structure

Through its operating companies, the Group employs more than 200,000 people (including associates) working in 3,000 offices in 112 countries.

The WPP parent company ("WPP plc") employs approximately 400 people in offices in London, New York, Beijing, Shanghai, Tokyo and Sao Paulo.

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. This commitment is outlined in 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 and our Sustainability Policy which are available in multiple languages.

Our key policies and information about our approach, including our Codes of Business Conduct, are available to existing and potential supplier partners on our website: <http://www.wpp.com/wpp/about/howwebehave/governance/>.

Our policies are developed within relevant departments following a process of stakeholder consultation, cross-departmental information sharing and senior management review and approval. Our policies are set at WPP plc level, with implementation devolved to our

operating companies. WPP plc provides a clear policy framework, which is communicated to our operating companies via the intranet, newsletters, eLearning, onsite training and emails.

We want to ensure that ESG risks and opportunities are managed consistently across the Group and that our policies are implemented across our companies and locations and with our suppliers. WPP plc provides ongoing support to encourage and facilitate implementation of the policies by the operating companies. In addition, our internal sustainability advisors are working with our operating companies to review implementation of our standards and to identify and address areas for improvement.

RECENT UPDATES

In early 2018 we revised our central procurement policy to embed more specific sustainability criteria in the supplier selection process and provide guidance on assessing supplier compliance. We also included a new procedure for the completion and evaluation of a supplier questionnaire to strengthen our due diligence process for supplier selection.

Due Diligence in Our Business and Our Supply Chain

We conducted an internal risk assessment on our WPP parent operations by evaluating country risk in relation to office location and size, type of labour and business operations. Given the nature of our business in these countries and that most of our people are direct employees, we ascertained that the risk of trafficking or slavery amongst this category is very low.

The Group has a large global supply chain as we buy goods and services from over 130,000 suppliers around the world at an annual cost of approximately £5.3 billion.

Our main categories of spend include IT, travel, telecommunications, professional services and facilities and those used in client work, such as advertising production, market research and other marketing services.

WPP's Group Procurement team manages the appointment of "approved suppliers", where contracts are entered into at the WPP parent level. An "approved supplier" is defined as one that has been appointed following evaluation against assessment criteria, including risk, operational, commercial and sustainability considerations. WPP's current annual spend with our "approved suppliers" is approximately 47% in markets where we have a Group Procurement Team. The large numbers of supplier partners we work with and the diversified nature of procurement within WPP means we have to prioritise our efforts.

Each WPP operating company is required to use WPP's "approved suppliers" for commonly purchased goods and services, whenever possible. In addition, each operating company is expected to maintain a list of locally approved suppliers based upon the formal selection process outlined in WPP's procurement policy. It is the responsibility of our operating companies to select, monitor and manage any suppliers that they use if they are not listed on WPP's central "approved supplier" list. Our sustainability team is working with our operating companies to ensure they take a consistent approach to implementing our responsible

sourcing standards. WPP plc also provides support to our operating companies to conduct their own risk assessments.

As part of our procurement policy, WPP expects all of our suppliers to abide by the same principles outlined in our Codes of Conduct. Our suppliers must either agree to adhere to our Codes of Business Conduct or confirm their adherence to their own Codes of Business Conduct that comprises the same principles. We also include a “right to audit” clause in our purchase orders.

We have assessed the risk of modern slavery amongst the WPP parent company approved supplier partners, across nine categories of spend. To ascertain the risk of modern slavery among these supplier partners, we evaluated their category risk in relation to category spend. Almost 90% of our spend with approved supplier partners is in medium- or low-risk categories such as professional services. We identified facilities and promotional goods as high-risk categories. For the country risk evaluation, we referred to Maplecroft’s Global Modern Slavery Risk Index. 94% of our spend with approved supplier partners is in countries deemed medium- or low-risk according to the Index. For promotional goods, which was found to be high risk in country and category, we not only assessed our approved supplier partners but also additional suppliers where the relationship is managed by our operating companies. In 2018 we reevaluated our risk assessment following feedback from our operating companies and moved a category of operations from low to medium risk.

RECENT UPDATES

At the end of 2017, we developed new sustainability questionnaires to strengthen our due diligence process for supplier selection. The first, a pre-selection questionnaire, is for use with all potential new suppliers. It assesses compliance with our core standards for legal compliance, labour and human rights practices, environment and supply chain management. The second, a more detailed information request, will be used with selected suppliers to monitor standards in our supply chain and work with suppliers to address gaps and risk areas.

In January 2018 we piloted the questionnaires with over 100 existing suppliers in higher risk categories and locations including facilities and promotional goods suppliers in the UK, Asia Pacific and South America.

Monitoring

WPP has a third party-managed “Right to Speak” helpline that is in place throughout the business and is overseen by WPP’s legal and internal audit departments. All employees (direct and indirect) have access to this helpline through which they can report any concerns or suspected cases of misconduct, including suspicions of forced labour or trafficking activities. This is publicised through induction packs, the Group intranet, the WPP Policy Book and our ethics training. Each operating company is responsible for ensuring that all employees are informed about the helpline. In 2017, 106 calls were received and reviewed and it was confirmed that none of these calls were related to modern slavery issues.

RECENT UPDATES

During 2017, as part of a new sustainability programme, we piloted our sustainability self-assessment questionnaire with our six largest companies. This assessed how our sustainability-related policies covering governance, employment practices, environment and supply chain are being implemented and provided insight into the ESG risks, challenges and opportunities our companies face at the local level.

The results have been communicated back to our companies who are developing individual action plans to address any gaps in implementation. We are also using the findings to develop a Group-level action plan which will include on-site assessments, engagement and training for our companies and targeted projects to support continuous improvement on sustainability.

From the questionnaire, we identified and measured KPIs for two key areas relating to modern slavery as below:

<i>Modern Slavery KPIs 2017</i>	
<i>Awareness</i>	<i>98% of all operating companies are aware of new legislation relating to Modern Slavery</i>
<i>Remediation</i>	<i>93% of all operating companies have ensured that staff have access to remedy via Right to Speak Helpline</i>

During 2018, our sustainability advisors will be working with our internal audit function to further embed assessment, management and control of ESG risks into the work of our internal audit teams.

Training

In early 2017 we conducted training with WPP's Group Procurement team on the risks and issues of modern slavery within our business and supply chain. We have now extended this training to our largest operating companies. By applying a "train the trainer" approach, our onsite training is recorded and materials are provided to the operating companies so that they can provide the training throughout their networks.

We have also issued guidance to our operating companies reiterating that we do not tolerate people trafficking or forced labour and providing examples of risk areas. It is the responsibility of our operating companies to ensure that this is communicated to all employees within their operations.

Our Progress So Far and Next Steps

WPP is committed to maintaining high ethical standards, protecting human rights and acting with honesty and integrity in everything we do. We endeavour to understand where there are risks of modern slavery within any part of our business and supply chain so that we can address them appropriately and sustainably.

We are taking part in the Business Against Slavery Forum, an initiative between the business community and the UK Government's Home Office.

Since 2016, WPP has identified four key areas where we are focussed on making improvements to ensure we mitigate the risk of modern slavery in our business:

- 1. Policies**
 - ✓ *Revision of central procurement policy to embed more specific sustainability criteria in the supplier selection process and provide guidance on assessing supplier compliance to strengthen our due diligence process*

- 2. Supply Chain**
 - ✓ *Risk assessment conducted on WPP parent company "approved" suppliers*
 - ✓ *A new supplier questionnaire developed to be integrated into the supplier selection process*
 - ✓ *A new procedure established for the evaluation of a supplier questionnaire, which will be rolled out to all supplier partners across the Group*

- 3. Monitoring**
 - ✓ *Identify and measure two KPIs relating to modern slavery across the Group*

- 4. Training**
 - ✓ *Training conducted for WPP's Group Procurement team*
 - ✓ *Train the trainer approach developed*
 - ✓ *Training conducted at one of the largest operating companies*

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. We regularly review and refine our policies and procedures. 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 operations and supply chains across the Group.

Approved by the Board on 23/05/2018


Signed by Paul Richardson, WPP Group Finance Director

