

31 DECEMBER 2023

Modern Slavery Statement

Introduction

This is a statement made by The&Partners Group Limited and its subsidiaries (together being "T&PM") in relation to the Modern Slavery Act 2015 and describes our commitment and the steps we take to prevent modern slavery in our businesses and our supply chain. This statement covers the financial year ending 2023.

T&PM is committed to ensuring compliance with all applicable laws, rules and regulations across our business and in our supply chains, acting ethically in all aspects of our business and maintaining the highest standards of honesty and integrity. This includes ensuring the prevention of modern slavery and other human rights breaches in our businesses and supply chains at all times.

About us

T&PM is an agency holding company that brings together specialisms including creative and design, media planning and buying, content and digital engagement, PR and influencer marketing, live events and experiential, and data analytics and CRM. We are a cross-discipline group built for the current complex industry landscape.

WPP Plc ("WPP") is a significant shareholder in T&PM and our Board of Directors (comprising of directors from WPP and T&PM) regularly monitors and reviews the steps that we are taking to ensure that there are no human rights breaches or modern slavery occurring in any of our businesses or supply chains. As a member of the WPP group we adhere to WPP's Modern Slavery Statement which can be found at: <https://www.wpp.com/=/media/project/wpp/files/sustainability/modern-slavery-act-statement-june-2024.pdf>

In 2023 (and for each financial year) we continued to review our business and supply chains, in particular in relation governance and to sustainability. Our direct employees and officers are skilled professionals within the advertising, marketing and communications services sector and supply chains mainly include production companies, media agencies, software companies, I.T. and other office equipment,

professional services, office cleaning and other office facilities services. As a consequence of this risk assessment we have concluded that we continue to have a very low risk of any modern slavery in relation to our own business and/or our supply chains.

It is not possible for any business to eliminate the risks in relation to third party suppliers (particularly production partners) and so in 2023 we have continued to focus our attention on identifying and minimising such risk in our supply chain (see 'due diligence' section below).

Our policies

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 of our people are required to uphold our Code of Business Conduct.

Our Code of Business Conduct - Supplier Version sets out our expectations of suppliers and is based on the above Code of Business Conduct 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. The principles of the Code are embedded in our training courses.

Our Code of Business Conduct and Code of Business Conduct - Supplier Version is set within a wider ethical framework which includes our Human Rights Policy Statement, Anti-bribery and foreign corrupt practices Policy and our Sustainability Policy. These policies outline our positive contribution to society and the environment underpinned by our responsibility to respect human rights.

Our Procurement and Contracting Policy, which is applicable to our employees (available upon request), 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. In 2023, we have updated our supplier terms and conditions in the UK to include reference to sustainability obligations and improvement of energy consumption. We have also embarked on a thorough review of our supply chain with external consultant, Orbis and WPP's sustainability team in order to assess our emissions and look at our strategy in relation to targets. We are committed to reviewing our operations.

Our People Team are responsible for recruitment and people management and work closely with our management team to ensure that all of our employees are treated with dignity and respect. We adhere to WPP's commitment to pay no less than the voluntary

living wage to our people and all onsite contractors such as cleaning, security and catering staff in the UK. This exceeds the UK's statutory national living wage. The WPP group is a living wage employer accredited by the Living Wage Foundation.

Our employment policies address issues such as equal opportunities, protection of personal data, whistleblowing, harassment and bullying, health and safety in the workplace, holiday and sick pay.

These policies are reviewed annually to ensure that we protect the rights and freedoms of all those working in our business. In 2023 we continued to monitor and review our policies, identifying any gaps, and ensured that appropriate policies were put in place to minimise any risks of modern slavery in our workforce or that of any of our suppliers. Our General Counsel, external Legal Counsel, Chief Financial Officer and People Team led this review and have taken appropriate steps to monitor and ensure compliance with these policies within the workforce and in our supply chains throughout 2023. This includes by carrying out risk assessments of our workforce and supply chains and taking any required action as appropriate.

Effectiveness and Key Performance Indicators

We use a number of key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains, including KPIs regarding:

- training our staff about modern slavery issues;

- contacting our suppliers to seek information about their employee rights awareness training procedures or employee contracts;

- regular auditing of our approach to managing the risk of modern slavery.

We continued with our review of our procurement processes and systems and in 2023, and we carried out a wider programme review with our external consultants, Orbis, in order to assess how we as a business perform in Scopes 1, 2 and 3 as well as a review of information available to set appropriate targets.

Due diligence

We do not tolerate any form of modern slavery or human trafficking in any part of our business. As well as compliance with the codes described above, we continue to require our suppliers to comply with all applicable laws, including modern slavery laws and to have suitable practices and procedures in place to ensure that human trafficking and slavery does not take place in their organisations or their supply chains. We enforce a strict code of compliance and do not tolerate slavery or human trafficking in our supply chains. We monitor our suppliers on an ongoing basis and will

immediately seek to terminate our relationship with any suppliers who we believe may be involved in modern slavery or human trafficking.

We have identified all of our major suppliers and carried out a risk assessment in relation to these suppliers. This assessment concluded that these suppliers are very low risk from a modern slavery perspective. We have updated our standard supplier terms and conditions to ensure contractual obligations are included to cover modern slavery and sustainability requirements.

Governance

We have established governance processes and policies to help us manage human rights risks, including modern slavery, consistently across T&Pm. In 2023, we set up a

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responsibility for our approach to risk management which is driven by our culture based upon the principles set out in our Code of Conduct. In 2023, we also communicated our new governance policies to all of our staff.

Our next steps for 2024 include continuing to build effective governance, providing more training and re-assessing our procurement processes to ensure compliance with our policies.

This is in addition to the governance and compliance commitments made by WPP, as detailed in WPP's Modern Slavery Act Statement ([available here](#)).

Remediation

Our people can report concerns or suspected cases of misconduct confidentially (and, if they wish, anonymously) through our &Action account which is overseen by our People Team and General Counsel and is available via email. We publicise the facility in induction packs, on our intranet and external website, in offices, in our staff handbook and via our ethics training. Alternatively, if someone feels uncomfortable with reporting concerns in this way, they have the option to raise any concerns via WPP's confidential speak up helpline: Right to Speak. We do not tolerate any retaliatory behaviour against individuals reporting concerns. We are committed to providing a safe and confidential way for people with genuine concerns to raise them, and to do so without fear of reprisals. To date we have received no Right to Speak reports about our business which relate to modern slavery.

Training

During 2023 all of our people (including freelancers working for more than four weeks) required to complete WPP's online ethics training, How We Behave, as part of their onboarding process. Topics covered include diversity, human rights, anti-bribery and

corruption, conflicts of interest and avoiding misleading work. All of our policies are accessible by our people on our intranet.

Conclusion

We are committed to ensuring that there is no modern slavery, human trafficking, or unlawful child labour in our supply chains or any part of our business. We will continue to review our policies and procedures, training and enforcement of our compliance commitments to ensure that the risk of slavery and human trafficking is carefully monitored and fully understood by all employees in our business and that it is not tolerated in our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes T&PM's slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by T&PM's board of directors on 25 June 2024.

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Our Work

Our Thinking

&AI

AI at T&Pm

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