



## WPP MODERN SLAVERY STATEMENT 2024

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 2024 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.

In 2021 an estimated 50 million people were living in modern slavery which represents an increase of 10 million since 2016, according to the latest [Global Slavery Index](#). We know that modern slavery exists in almost every country in the world regardless of income. Yet, G20 nations account for more than 75 per cent of the world's trade and, collectively, import US\$468 billion worth of at-risk goods per annum.

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

We believe in the power of our work to create positive change. Every campaign, every message, has the potential to shape attitudes, influence opinions, and inspire better behaviour. That's why we're committed to acting ethically and with the utmost integrity in everything we do, ensuring that our work reflects our values and contributes to a more responsible society.

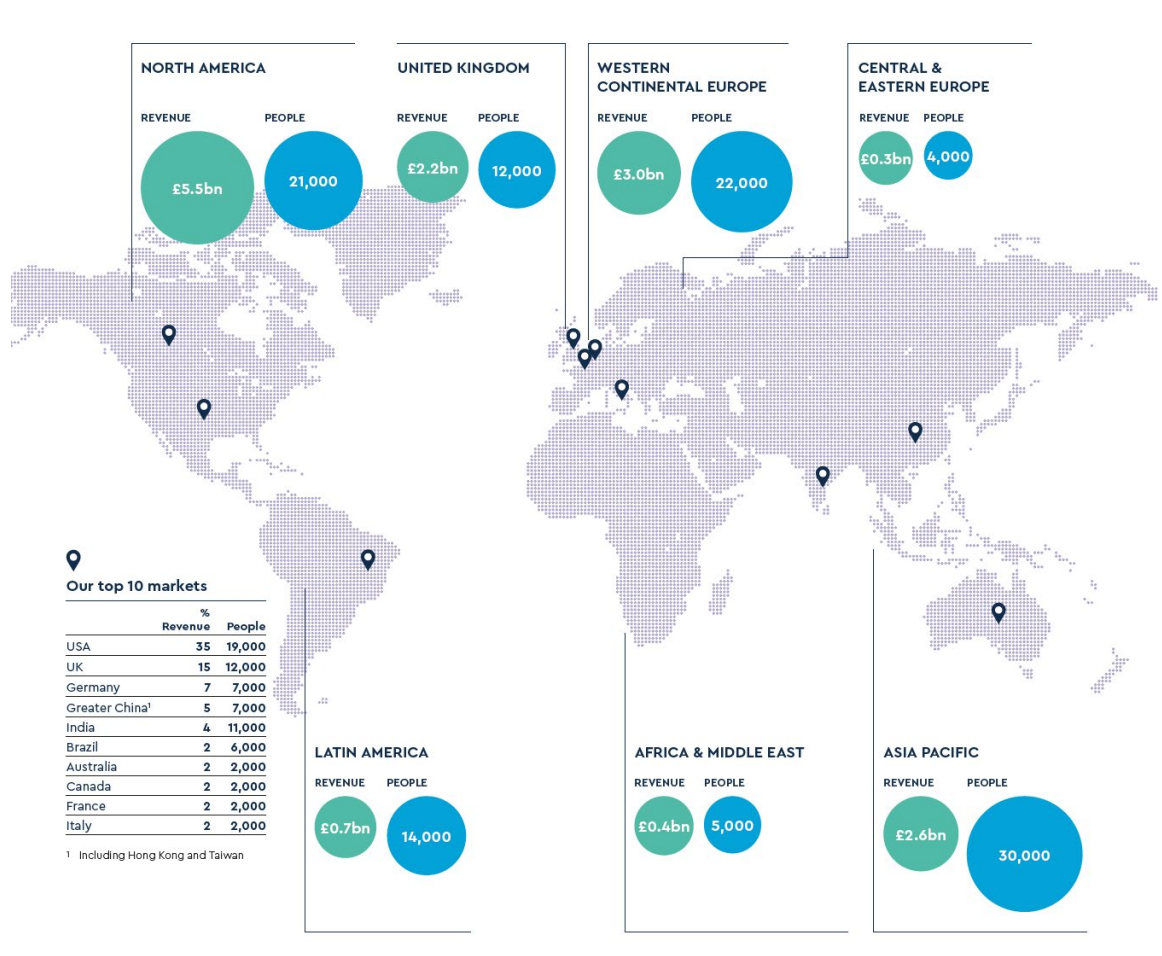
We also provide pro bono creative services to organisations working on human rights, health, education, arts and the environment, and negotiate free media space for charity

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

## OUR OPERATIONS

*WPP and our agencies employ 108,000 people in over 100 countries across the globe and work with clients including around 300 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 and ethical 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 approximately 70,000 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 and marketing services, production and media.

## RISK ASSESSMENT

We continually review supply chain risks based on country, industry sector, categories of goods and services, and individual suppliers.

We continue to enhance and improve our procurement ecosystem and infrastructure and have been through an extensive procurement transformation programme to optimise how we buy. This includes our approach to how we manage WPP's Tier 1 supplier network.

In 2024:

- We continued to evolve our approach to supply chain risk assessments. Key suppliers across each indirect procurement category have been assessed and we are able to manage specific risks associated with those suppliers. The next phase will see us establish a framework for supplier relationship management, which will include risk management as an integral element.
- We established the Procurement Risk Committee to enhance governance, oversight, and risk management in indirect procurement activities. This committee will improve risk monitoring and strengthen decision-making. By fostering collaboration across the procurement function, it helps build resilience, compliance, and alignment with business objectives, with the goal of safeguarding integrity in our supply chain.
- We reviewed and enhanced our Procurement Policy and our supplier due diligence processes, leading to a more standardised and consistent approach to upfront supplier risk assessment.
- We continued to work with third-party service provider SlaveCheck to explore how their 'collective intelligence' model can help identify and flag potential slavery risks or incidences within global supply chains.
- We commenced a review of the frameworks and processes we use to conduct human rights assessments within our Tier 1 supply chain, to enhance visibility and transparency across our Tier 1 suppliers, including refining our risk assessment methodology. We continue to standardise and enhance procurement processes and systems, including those around supply risk management, procurement policy compliance, contract lifecycle management (CLM) and supplier onboarding and

supplier relationship management (SRM).

## **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 impact (such as anti-bribery and corruption) and other sustainability topics.

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

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 impact (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 policy 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 February 2025.
- Our Procurement Policy was reviewed in 2024 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 2024 Annual Report, from page 73.

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 and Business Integrity Programme on page 73 of our 2024 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 2024**

All whistleblower reports received by the Group Chief Counsel and General Counsel, Corporate Risk, which includes all Right to Speak reports, are 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. Recommended remediation can include disciplinary action, changes to systems, controls and processes or wider review and monitoring for a particular period.

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. WPP's business integrity team also merges these learnings with other data feeds (both internal, such as revenue source and breakdown or margin patterns, and external, such as Transparency International's Corruption Perception Index) to identify and focus on potential risk concerns.

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 2024, a total of 609 reports were received from whistleblowers, 507 of which were through the Right to Speak hotline. All reports were followed up, investigated where appropriate by our business integrity team, and reported to the Audit Committee. 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 fifth 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](#).*



## TRAINING AND AWARENESS

All of our people (including freelancers working for more than four weeks) are required to complete our mandatory online training programme promptly upon joining and then on an annual basis. The programme comprises five modules: How We Behave, Business Integrity, Safer Data, Sustainability, and Belonging. Topics covered include 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. We continue to ensure that all group Procurement employees complete mandatory modern slavery training upon joining WPP. 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.

### WHERE WE ARE NOW

- For the training period 2024-2025, nearly 90,000 employees, freelancers and contractors have to-date completed WPP's online ethics training.
- We commenced a refresh of our ethics training, including an update to the sustainability module which covers human rights and modern slavery. This activity will be finalised in 2025.
- All members of our global procurement team successfully completed mandatory Modern Slavery and Human Rights training. New team members will complete the training as part of their induction.

## MAPPING OUR PROGRESS

	In 2023 we stated that:	Progress to date:	Next steps:
<b>Identifying and managing the risk of modern slavery</b>	We would commence the roll out of a new Source to Contract IT Platform, intended to automate, standardise and streamline many of our currently manual procurement processes and systems relating to indirect supply risk management, procurement policy compliance, contract lifecycle management and supplier onboarding and supplier relationship management.	At the end of 2024, we commenced the roll out of our new Source to Contract IT Platform and shall conclude its implementation in the first quarter of 2025.	In 2025, we will continue to build upon this digital risk management infrastructure, by adopting a 3 <sup>rd</sup> party Risk Identification and Monitoring platform, which will allow us to effectively identify, prioritise and monitor ESG risks across our indirect supply base.
<b>Awareness and training</b>	In 2023, we continued to ensure that as part of the onboarding process for new Procurement team joiners, mandatory modern slavery training is carried out, with periodic refresher training for the Procurement team.	In 2024, all new Procurement team members took part in and completed modern slavery awareness training.	In 2025, we will develop refreshed modern slavery training for the Procurement Team.
<b>Monitoring</b>	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.	Right to speak: In 2024, we reviewed and followed up concerns received through our Right to Speak facility. We received a total of 609 whistleblower reports.	Ongoing monitoring: We will continue to address concerns received from stakeholders.

Approved by the Board on 23 May 2025

Signed:



**Mark Read**  
Chief Executive Officer  
WPP plc