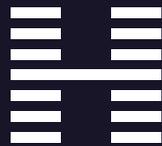


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**Hogarth Worldwide**  
**Modern Slavery Statement**  
2021



**HOGARTH**

Hogarth Worldwide is a subsidiary of WPP and is therefore covered by the following statement which has been prepared in fulfilment of the obligations of WPP plc ("WPP") and its subsidiaries under the Modern Slavery Act 2015. This statement covers the financial year 2020 and describes our commitment and steps taken to mitigate modern slavery in our business and supply chain.

## Introduction

2020 was a tough year. For everyone. The pandemic reshaped our daily lives, forced us to give up what we once took for granted, and distanced us from our families, friends and colleagues. It continues to have an untold human cost around the world. The killing of George Floyd created a wave of hurt and protest and reminded us once again of the deep-seated inequities faced by our Black colleagues. Political division and the climate crisis loomed ever larger. We have been reminded that life is fragile.

The economic and social disruption caused by the pandemic has profoundly affected the global labour force, increasing vulnerability to slavery and forced labour whilst simultaneously hindering the efforts to help those already enslaved.

In 2017, it was estimated that there were already 40.3 million people in modern slavery ([ILO, 2017](#)). In early 2020, the International Labour Organisation reported that the labour crisis created by COVID-19 may see global unemployment increase by almost 25 million. Working poverty rates will increase significantly, with a prediction that there will be between 20.1 million and 25 million more people in working poverty than in the pre COVID-19 estimate ([ILO, 2020](#)). In addition, we have seen an increasing body of evidence showing that as climate change disrupts livelihoods across the world, climate-driven migration has led to increased risks of human trafficking ([Anti-Slavery International, 2019](#))

We know that modern slavery exists in the countries in which we operate and we recognise the important role that our business has to play in combatting exploitative labour practices from our operations and supply chain.

WPP is committed to maintaining high ethical standards, protecting human rights and acting with honesty and integrity in everything we do. We do not tolerate any form of modern slavery, forced labour or human trafficking in any part of our business or supply chain. We are committed members of the UN Global Compact and support its 10 principles for human rights, labour, environment and anti-corruption. Our Modern Slavery Statement outlines how we embed these commitments into the way that we work and our approach to tackling modern slavery.

Whilst 2020 has tested as all we have also discovered how resilient and inventive we are, and how much we can achieve when people come together. The world's development and deployment of vaccines in record time has been little short of miraculous. At WPP, we worked with governments, commercial clients, NGOs and international health bodies, including the World Health Organization (WHO), to produce public awareness campaigns to help limit the spread and impact of Covid-19 and build confidence in vaccines. We know that the work we do has the power to shift opinion and change behaviour, supporting our clients to transition to a sustainable world. We aim to use the power of our creativity and voice to support healthy and vibrant communities.

# About us

WPP is a creative transformation company. We use the power of creativity to build better futures for our people, planet, clients and communities through an integrated offer of communications, experience, commerce and technology. We offer capabilities in advertising, branding and identity, content, media investment, public relations and public affairs, and healthcare. WPP's agencies work with clients including 325 of the Fortune Global 500, all 30 of the Dow Jones 30, 62 of the NASDAQ 100 and 61 of the FTSE 100.

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 report progress against its 10 principles annually.

The work we do has the power to shift opinion and change behaviour, supporting our clients to transition to a sustainable world. We support our clients to create brands with purpose and to integrate sustainability into their strategies, communications and marketing. With over \$60 billion in advertising placed in 2020, WPP is the world's largest investor in media advertising through its subsidiary GroupM. To ensure that our influence is positive, 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](#).

## CASE STUDY: PLEASE ARREST ME

### CLIENT: RIT FOUNDATION

In India, two in three women are raped by their husbands and it is totally legal. The law has an exception where rape inside a marriage is not a crime.

To change the law, RIT Foundation, an Indian NGO fighting for women's rights, needed to raise awareness. So they found Sameer, an activist, who turned himself in to the police pretending he raped his wife. Within minutes, he was freed. Ogilvy filmed the entire process - from interviews with lawyers and victims, to Sameer going into the police station with hidden cameras and being told that raping your wife is not a crime - exposing how India treats marital rape cases.

The story sparked fierce reactions online. Thousands tried to silence the campaign and even managed to take down its content four times. Censorship tried but didn't shut the debate - with the help of feminist activists and influencers who shared the Foundations videos and content, the conversation progressed and forced the patriarchal society of India to deal with the issue. Thanks to this campaign, the case to change marital rape laws will be heard at the Delhi High Court.

#### AWARDS

##### ONE SHOW

2020 Gold Onescreen Best Documentary

2020 Silver Pencil Social Media

2020 Bronze Pencil Film Long Form

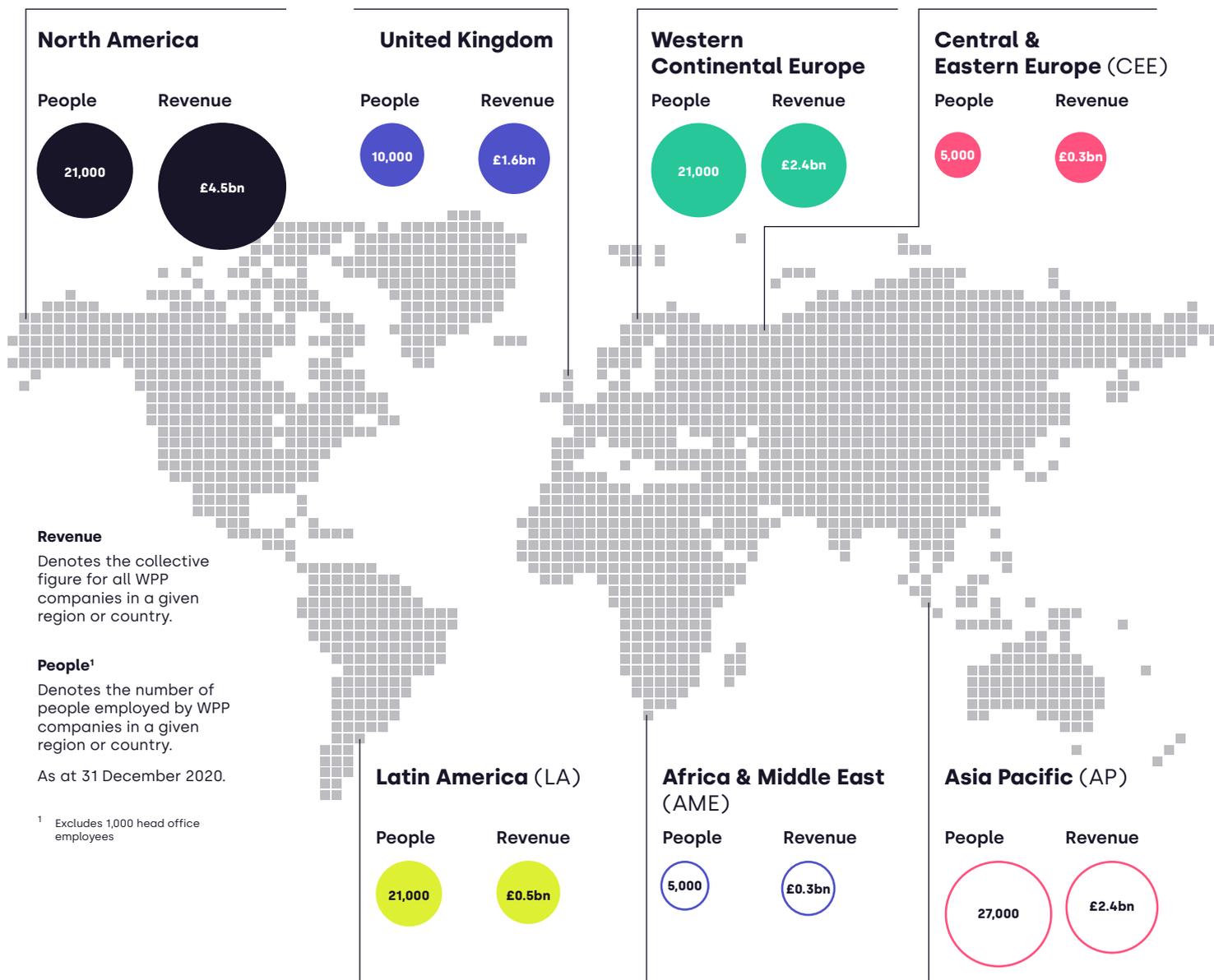
D&AD

2020 Wood Pencil/Entertainment/Non Fiction

# Our operations

WPP and our [agencies](#) operate in 111 countries, employing 100,000 people. 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 'high risk' countries based on [Global Slavery International's Modern Slavery index](#). However, based on an [Walk Free Foundation's Modern Slavery Business Toolkit](#), which outlines sectors at high risk of modern slavery, 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.

# Our supply network

**WPP is committed to creating an inclusive, sustainable, ethical, and diverse supplier network of business-enabling vendors.**

Due to the organisational structure of our business and diversity of services that we offer, we have a complex and dynamic supply chain ecosystem to manage. At any given point we estimate that we work with over 130,000 companies across our supply network.

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.

## Where we are now

In 2020, we began an extensive transformation programme to modernise our procurement ecosystem and infrastructure and optimise how we buy. Workstreams include expanding our spend analytics tool across all markets by the end of 2022 and standardising processes and systems, beginning with the global roll-out of our travel programme in the second half of 2021. This extensive transformation programme will facilitate the introduction of full life-cycle mapping and traceability across WPP's supplier ecosystem. This will enable greater ability to monitor and track modern slavery risks and will allow WPP to react efficiently to issues if they arise. This multi-year programme is being led by our Chief Financial Officer and Chief Procurement Officer, with support from WPP's Group sustainability team to embed the new controls and processes that are critical to a robust and responsible sourcing programme.

### **WPP's supplier diversity programme**

On 17 June 2020, WPP announced a set of commitments and actions to combat racial injustice and support Black and minority talent including launching a Supplier Diversity Programme to give greater support to minority owned businesses.

The WPP Supplier Diversity Programme will enable us to establish a community of diverse suppliers that are integral to upholding our culture and values of openness, optimism and a commitment to extraordinary work.

The WPP Supplier Diversity Vision is to unlock value adding, innovative and sustainable partnerships via a diverse, credible and reliable third party supplier network.

As part of our new programme, WPP have joined the Global Supplier Diversity Alliance, with memberships in Australia, the UK and the United States. This gives us access to global directories of Certified Diverse Suppliers, so we can actively search and include them in our RFPs and client tender responses. We can also access best practice so diverse suppliers not only win contracts but also thrive in our ecosystem. We are working with these national networks to create a supplier diversity roadmap to help us grow the number of Certified Diverse Suppliers on WPP's approved supplier list, monitor and track how we buy from this community, and identify any unique needs so we can support Certified Diverse Suppliers to succeed.

As we build out our Supplier Diversity roadmap, we are also designing controls and processes to ensure that we mitigate the risk of modern slavery or forced labour, whilst generating opportunities to work with diverse suppliers.

# 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 important 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 [Business Code of 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 Business Code of Conduct, which is available in multiple languages.

[Our Business Code of 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. 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

WPP's Code of 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. In addition, we have a [Sustainability Policy](#) which outlines our positive contribution to society and the environment underpinned by our responsibility to respect human rights.

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 must consider sustainability risks and criteria to determine whether suppliers are fit for purpose. Our sustainability team works with our companies to ensure that they maintain the effective implementation of a responsible procurement policy and process.

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, the parent company, 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

- This year, we reviewed our sustainability, procurement and human rights policies in order to ensure that they are aligned with WPP's culture and standards of ethics and can be implemented effectively. We are in the process of revising these policies and will publish them in 2021.
- 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. The application of our policies and procedures is monitored within each company 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.

# Due diligence in our supply network

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 our people.

As per our Procurement policy, at the supplier selection phase, Group Procurement ensure that all potential suppliers read and sign WPP's [Business Code of Conduct – Supplier Version](#), confirming that they will comply with our standards or demonstrate that they have the equivalent standards in place. Before WPP enters into a commercial agreement, either this document should be signed and returned, or the supplier must demonstrate that it complies with equivalent standards. In addition, suppliers are required to complete self-assessment supplier questionnaires, which include specific questions on modern slavery that are used to strengthen our due diligence process. Any issues raised on these questionnaires are flagged to the relevant WPP team for further investigation.

As part of the supplier onboarding stage, we include a "right to audit" provision in the supplier documentation and our global Supplier Agreement includes a specific clause relating to modern slavery. WPP reserves the right to terminate its contract with any supplier who is found to be in breach of, or who fails to comply with, any legislation pertaining to modern slavery.

Whenever possible, Hogarth Worldwide use WPP and/or our own "approved suppliers" who are appointed by the WPP Group Procurement Team for commonly purchased goods and services. These "approved suppliers" are selected in accordance with the WPP Procurement Policy. If we need to use a supplier outside the "approved supplier" list, then it is our responsibility to select suppliers in accordance with the process and due diligence requirements outlined in the WPP Procurement Policy.

## Where we are now

- In Q1 2020 we launched new Mindful Purchasing Guidelines that have been communicated throughout our business operations by our Chief Financial Officer and wider finance community. These outline how to select suppliers and partners that meet our responsible sourcing standards
- In Q2 2020 we revised our supplier questionnaire to include new questions on supplier diversity and carbon reduction

**Within the wider transformation of our procurement data systems and processes, we will be modernising and standardising our due diligence and supplier onboarding processes to help us consistently select suppliers that meet our responsible sourcing standards and partner expectations.**

# 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. Senior managers in all our agencies and our business and supplier partners are asked to sign a copy of the WPP Code of Business Conduct each year to confirm they will comply with its principles. Our Board-level Sustainability Committee and Executive Committee sustainability working group 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 Conduct and our internal control framework.

For more information about our "Risk Governance Framework and Business Integrity Programme" please see page 90 of our [Annual Report 2020](#)

## 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, including issues such as modern slavery. As set out more fully in "Risk Governance Framework and Business Integrity Programme" from page 90 of our Annual Report 2020, we want to champion and facilitate a culture where our people feel that acting with 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 legal and business integrity teams 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 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 2020

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. Reports are also analysed for risk impact and root causes. Learnings generated from this analysis are converted into recommendations including for training sessions, workshops and practical resources by WPP's business integrity function and implemented together with the support and input of the Risk Committees. Recommended remediation can also 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 and the approach and process are reviewed by the auditors. 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 2020 the WPP Risk Committee's terms of reference were updated to home in on the appropriateness of WPP's values, culture and reward systems for managing risk and internal controls, and the extent to which culture and values are embedded at all levels of WPP
- In 2020, we received 418 Right to Speak reports (2019: 361), all of which were followed up, investigated where appropriate by our legal and business integrity teams, and reported to the Audit Committee. None of these reports was linked to concerns of modern slavery

#### Australia

In line with the Australian Modern Slavery Act 2018, WPP AUNZ has outlined its own modern slavery risk assessment process conducted in 2020. The key purpose of WPP AUNZ's initial risk assessment was to identify the areas of likely greatest modern slavery risk in WPP AUNZ's own supply chain. This exercise then formed the foundation for WPP AUNZ's subsequent focus in its ongoing due diligence and remediation activities.

For more information about their risk assessment and please 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 online ethics training, How We Behave, as part of their onboarding process and then on regular process. Topics covered include diversity, human rights, anti-bribery and corruption, conflicts of interest and avoiding misleading work. Global Procurement are also trained on the risks of modern slavery within our business and supply chain as part of the supplier onboarding process.

WPP have 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 remediation process.

### Where we are now

- In 2020, the **How We Behave** training was refreshed and new modules were introduced on sustainability and business integrity. More than 95,000 employees completed the training across the WPP network
- In October 2020, over 100 of our HR Directors across the WPP network were trained on the risks of modern slavery within our business and supply network

- As part of our work on the Australian Modern Slavery Act, WPP AUNZ executive leaders gained a critical awareness of modern slavery and the risks it poses to our business via online learning modules and in-person training

## Collaboration

We will continue to expand and extend the work we do within WPP to improve our efforts to ensure there is no forced labour or human trafficking within our global operations or supply chains.

WPP is also committed to working with other businesses and governments to act against modern slavery. In the UK, we are a member of the Business Against Slavery Forum (BASf), which is convened by the UK Home Office.

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.

### **Transport initiative for survivors of modern slavery**

Using public transport to reach job interviews or appointments is prohibitively expensive for many survivors of modern slavery and can be a barrier to recovery.

In 2019, we supported the launch of an initiative, alongside charity Hestia, the Rights Lab from The University of Nottingham, The Salvation Army, Transport for London, and other companies, to understand the transport needs of survivors of modern slavery in London and build the evidence needed to push for policy change in this area.

Hestia said, "We are incredibly grateful to WPP for their support to this important and innovative project. Transport poverty is a significant barrier in the recovery and integration of survivors of modern slavery whom we support".

From December 2019 to February 2020, 100 survivors of modern slavery in London received Oyster cards, which were topped up fortnightly. They then took part in surveys and interviews to provide qualitative and quantitative data. The findings, due to be published in early summer 2020, will include policy recommendations for government to improve the provision of transport for those in the National Referral Mechanism, a framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support.

The Rights Lab said, "It is through research and evidence gathering such as this that we start to get an insight into the daily realities for survivors of modern slavery and can understand what is needed to enable them to thrive and not fall back into exploitative situations".

**Read the report "Going Places: Journeys to recovery" [here](#)**

# Mapping our progress

	In 2019 we stated that:	Our progress so far:	Next steps:
<b>Identifying and Managing the Risk of Modern Slavery</b>	Our Chief Procurement Officer is leading an automated consolidation of our supply chain systems across WPP in order to upgrade data insights on our suppliers. Working with Global Procurement, the Sustainability team will explore how to embed new controls and processes and develop a more mature responsible sourcing programme. This will, in turn, improve how we monitor and manage our modern slavery risks within our supply chain.	We have launched a global programme to transform Group Procurement within WPP. One of the major workstreams is modernisation, which includes the design, build and implementation of a new digital buying community platform. We are evolving our policies and processes to strengthen WPP's requirements pertaining to our zero tolerance of modern slavery alongside our other responsible sourcing standards that are integral to the programme. The design stage will be completed by the end of June 2021 and consultations are underway with key stakeholders (including WPP Sustainability Team, Procurement Teams and Operational Leads across the WPP network) to identify each of the processes required to deliver the objective of an automated supplier onboarding service. In addition to the above the Programme will see the full global capture rollout of our spend analytics tool during 2021 and Q1 2022.	Workstreams include expanding our spend analytics tool across all markets by the end of 2022 and standardising processes and systems, beginning with the global roll-out of our travel programme in the second half of 2021. We will be re-issuing and relaunching our procurement and supplier policies as new processes through the programme are introduced
<b>Awareness and Training</b>	Conduct 'deep dive' assessments: the WPP Sustainability team will work with the management teams of four UK companies as a pilot to explore how they implement responsible procurement practices.	A Sustainability Audit was sent to WPP's operating companies across 21 key markets to establish a 'baseline' of ESG practices. The audit contained questions relating to the monitoring and management of human rights, including risk assessment and responsible procurement practices.	Provide data analysis from the Sustainability Audit to inform a roadmap for continual improvement around modern slavery
<b>Monitoring</b>	Right to Speak: In 2019 we reviewed and followed up concerns received through our Right to Speak facility. We received and reviewed 361 reports, none of which identified modern slavery.	Right to Speak: In 2020, we received 418 reports, none of which identified modern slavery	Ongoing monitoring: We will continue to address concerns received from stakeholders.

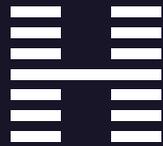
Approved by the Board on 8 June 2021

Signed:

**Mark Read**

Chief Executive Officer

WPP plc



**HOGARTH**