




Nielsen and its approach to human rights



2023 Nielsen Modern Slavery Statement for the year ending December 31, 2022

This Modern Slavery Statement was approved by the Board of Directors of Neptune Parent Topco LLC on behalf of Nielsen Holdings Limited on April 20, 2023.¹

This Modern Slavery Statement for Nielsen Holdings Limited also reflects the position of the subsidiaries controlled by Nielsen Holdings Limited (together referred to as “Nielsen” hereafter) as of December 31, 2022. It is also aligned with [Nielsen’s Global Commitment to Human Rights](#), which was updated in April 2023.

Our business and organizational structure

Nielsen shapes the world’s media and content as a global leader in audience measurement, data and analytics. Through our understanding of people and their behaviors across all channels and platforms, we empower our clients with independent and actionable intelligence so they can connect and engage with their audiences—now and into the future. Nielsen operates around the world in more than 55 countries.

Nielsen Holdings Limited is a private limited company formed under the laws of England and Wales and has local subsidiaries in the United Kingdom and Australia, which are covered under this statement.² Nielsen Holdings Limited and its subsidiaries encompass all of Nielsen’s global operations described in this statement. The worldwide organization is referred to in this statement as Nielsen.

As a global company with a commitment to integrity and corporate citizenship, we manage and monitor the risks of human and labor/employment rights violations associated with our operations and the suppliers who are core to our business across the globe. This statement constitutes our anti-slavery and human trafficking statement covering all of Nielsen, and our subsidiaries, for the financial year ending December 31, 2022.

¹The Board of Directors is the principal governing body of Neptune Parent Topco LLC, a Delaware limited liability company, which is the ultimate parent entity of Nielsen Holdings Limited. Neptune Parent Topco LLC was formed in connection with the acquisition of Nielsen by a consortium of private investment funds in October 2022.

²Nielsen’s UK subsidiaries covered by this 2022 report are Nielsen Media Research Limited, NetRatings UK Limited, Nielsen Sports UK and Ireland Limited, Visual IQ (UK) Limited, Advertising Intelligence Limited, Sorenson Media Limited (dissolved on 11 April 2022) and TVTY UK Limited (liquidated on 3 January 2023). Nielsen’s Australia subsidiaries covered by this 2022 report are The Nielsen Company (Australia) Pty Ltd, Nielsen Television Audience Measurement Pty Ltd, NetRatings Australia Pty Limited, The Nielsen Company (Holdings) Pty Limited, Repucom International Pty Ltd, Repucom Investments Pty Ltd, Nielsen Sports Pty Ltd, H W W Pty Limited and Landsberry and James Marketing Pty Limited.



Our supply chain

Nielsen's supply chain consists of purchases in three high-level categories: professional services, technology and measuring equipment. Close to half of our spend is with professional services (consulting, human resources, marketing, legal, finance, real estate, travel, etc.) suppliers which tend to be large, global companies headquartered in the U.S. or Europe. Another 40% of our spend is with technology and telecommunications suppliers. They are predominantly large, global enterprises based in the U.S. and Europe and, to a lesser degree, small- to medium-sized enterprises (SMEs) in emerging markets. The balance of our spend is on marketing research and related services, primarily with small- and medium-sized firms located in many of the regions where we operate. A relatively small subset of our suppliers are contracted manufacturers who manufacture Nielsen-designed electronic measurement devices to track television viewership and radio listening, with our research panels. These suppliers tend to be SMEs, primarily producing these devices in Asia. In 2022, the suppliers manufacturing our electronic devices were operational, with some pandemic-related shutdowns throughout the year.

Risk of human rights issues in our business and supply chain

We recognize that monitoring human rights risks is critical for all stakeholder groups, but that some groups may require a heightened type or degree of monitoring, resources and support. With that in mind, we have identified key high-risk groups that require more rigorous monitoring: manufacturing suppliers, panelists and Nielsen employees—for the last group, it is considered particularly important to monitor those who perform their job responsibilities in the field. Nielsen is continually evolving our approach to providing these groups and others with the resources and information they need to recognize and address potential human rights risks that might come up in the course of their work or interactions with Nielsen. More information on these resources can be found in the "Training available to our staff" section below.

As it relates to our supply chain, Nielsen understands that electronics manufacturing poses greater risks of human rights and supply chain violations than other sectors, particularly in certain geographies. To assess and address this particular risk, in addition to the required Environmental, Social and Governance (ESG) assessment, Nielsen requires its electronics manufacturing suppliers to complete specific social compliance questionnaires addressing human rights and fair labor/employment conditions at the production facility level. These self-assessments are required on a regular basis to monitor and evaluate human rights and labor/employment risks within supplier organizations. The results of these questionnaires, along with other supplier due diligence tools (such as the Responsible Business Alliance's risk assessment platform and our third party supplier ESG assessments) and subsequent dialogue, determine the suitability for social audits to be conducted by a third-party audit firm.

Additionally, for all active suppliers, Nielsen uses an online, third-party platform available to members of the [Responsible Business Alliance](#) (RBA) to assess conformance with the RBA Code Section A.1, which states, among other standards, that: "Forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used." This risk assessment online platform is used to evaluate specific supplier and factory risks with respect to the RBA Code (including Section A.1) by inherent risk, sector and location. In 2022 we continued using this tool to assess active suppliers across the globe for this risk.



Our policies and practices to protect human rights

Pursuant to the United Kingdom *Modern Slavery Act 2015*, Part 6, Section 54 and Australian *Modern Slavery Act 2018*, Nielsen has continued to take steps during the financial year to identify any sources of potential risk of slavery and human trafficking in our supply chain and other parts of our business. Nielsen aligns itself with the recommendations set forth in recognized external standards, including the UN Guiding Principles on Business and Human Rights, built on the UN Universal Declaration of Human Rights; the International Labor Organization (ILO) Conventions; European Convention on Human Rights; and the human rights-related recommendations set forth in the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Nielsen's alignment with these principles covers human rights risks related to—but not limited to—the following areas: discrimination, harassment, retaliation, excessive or forced labor, child labor, appropriate compensation and minimum living wages aligned with ILO conventions, safe working conditions, and slavery and human trafficking. We demonstrate our commitment to human rights and the fair treatment of workers with policies and practices that prohibit human rights abuses in our organization and our supply chain, particularly with regard to involuntary labor, human trafficking or unacceptable work conditions, including but not limited to, conditions relating to pay, hours and environment. This commitment is further outlined in our [Nielsen Supplier Code of Conduct](#) and [Nielsen's Global Commitment to Human Rights](#).

Nielsen leaders are responsible for ensuring our practices demonstrate a commitment to human rights. Functional responsibility for managing, monitoring and tracking potential human rights impacts and risks of our business and operations is managed across a variety of functions, including: Procurement, Operations, Corporate Audit, Human Resources, Legal & Business Affairs, Marketing & Communications, Finance, Corporate Citizenship and Diversity, Equity & Inclusion. Each functional group contributes its unique competencies to ensure that relevant human rights risks are addressed or incorporated into existing policies or practices as needed.

One such functional group with responsibility in this area is our Integrity Leader program, which is governed by Compliance & Integrity within Legal & Business Affairs. Integrity Leaders, Employee Relations and Human Resource People Business Partners (hereafter People team) are available to all employees to confidentially report any misconduct or concerns related to any aspect of the company, including any issue that may be related to human rights. In the normal course of their work, Compliance & Integrity, the People team, and the Integrity Leaders will use information relevant to human rights-related issues to drive awareness throughout the organization and to mitigate risk in this area. Integrity Leaders serve as “diplomats” of integrity to our employees, answering questions about doing the right thing, and spreading the word about how to raise concerns when something doesn't seem right. These teams follow a standard procedure to investigate any concern in order to ensure consistent outcomes and support organizational justice.

Our Security team is committed to ensuring the safety and security of our people in our offices, in the field, or working remotely across more than 55 countries in which we operated in 2022. Our approach is aligned with the [Voluntary Principles for Security and Human Rights](#), including the use of risk assessments that incorporate a local or regional understanding of potential human rights-related risks alongside any relevant prevention or mitigation actions. The Security team liaises with private and public sector entities as well as with external stakeholder groups to obtain actionable insights about new and evolving political, economic and health risks. This information is then used to frame our decisions on appropriate mitigation strategies to the new and evolving political, economic and health risks.



Nielsen develops and maintains processes to address potential issues of workplace health and safety for employees. We maintain a commitment to health and wellbeing. Nielsen's benefit offerings are designed to meet the varied and evolving needs of a diverse workforce across businesses and geographies. We have enhanced the ways we help our employees care for themselves and their families, especially in response to COVID-19. Our Whole You health and wellbeing program, created in 2015, focuses not just on physical health, but also on the emotional, financial, social and environmental well-being of our employees. Since 2015, the program has evolved to meet the needs of our diverse population globally. A key component of The Whole You is our group of well-being ambassadors (employee volunteers) who promote global, national and local well-being initiatives. We also have a mental health benefit for employees through a partnership with Spring Health, a mental health services platform. Spring Health offers counseling sessions to all employees and their family members ages 6 and over. Spring Health also provides coaching, mindfulness training, crisis support, and group sessions, all at no cost. In 2022, we offered Spring Health to 44 countries globally and now offer Emotional Health Support programs in every country where Nielsen has a presence.

We also manage relevant risks and opportunities through a variety of ongoing internal engagement channels and rely on guidance from leaders across the business. More information about our overall efforts across ESG areas critical for our business can be found in our [2022 Environmental, Social and Governance \(ESG\) report](#) and our [ESG key issues assessment](#).

Our due diligence processes to protect human rights across our business

Human rights are also embedded in our overall approach to Risk Management through our Enterprise Risk Management (ERM) framework. This multichannel collaboration allows us to take a more comprehensive and proactive approach to human rights risk management. ERM ensures that we are conducting regular assessments of our key risk areas, monitoring and reporting on these risks, and integrating any relevant findings into our organizational processes and policies as needed. We also monitor human rights-related risks on an ongoing basis through a variety of other internal audit processes across geographies and different areas of our business.

Training available to our staff

As it relates to employee engagement on human rights-related issues, our [Nielsen Code of Conduct](#) is separate from our [Supplier Code of Conduct](#) and establishes guidelines and expectations for lawful and ethical conduct by our employees around the world. Our Code of Conduct includes a section on “Protecting human rights” to ensure every employee is aware of and understands our obligations and expectations in this area, and encourages employees to be vigilant in protecting against exploitation of vulnerable populations, human trafficking and child and forced labor. The Nielsen Code of Conduct is translated into over 15 languages, and all employees are asked to certify annually that they understand and will comply with the Code of Conduct.* On Nielsen’s Compliance & Integrity Training Resources intranet site, Nielsen provides a virtual training video for our employees about the warning signs of modern slavery and human rights violations when working with suppliers, which is available in 20 languages.

As it relates to training available to our staff who work with our supply chain, through our membership in the RBA, we make online training modules on the [Nielsen Supplier Code of Conduct](#) available to both Nielsen employees and suppliers. Training modules in social compliance can be assigned to internal staff and suppliers, and supplier participation is tracked within the RBA tool. Our Global Procurement team maintains completed RBA certificate training on the Supplier Code. Nielsen provides further training to those with a direct supplier relationship to ensure they are readily capable of identifying any potential abuses. Two members of the team who work with electronics manufacturers have been trained by the RBA to audit factories against the Supplier Code.



Our due diligence processes to protect human rights across our supply chain

Nielsen is a supporting member of the [Responsible Business Alliance](#), and as such, our [Supplier Code of Conduct](#) is harmonized to this industry code. The RBA Supplier Code has been adopted by more than 100 Fortune 500/multinational corporations engaged within the global electronics supply chain. We have chosen to align ourselves with this industry code and organization due to the particular risk of exposure to labor exploitation within the technology and electronics equipment manufacturing segments of our supply chain. We use our best endeavors to ensure all suppliers agree to adhere to our global supplier code or their own equivalent code and to include contractual requirements for legal compliance.

Prior to contracting with a supplier, Nielsen establishes a baseline of expectations regarding social compliance through our [Supplier Code of Conduct](#). We assess the social compliance risk of new suppliers prior to contracting with them and require management systems necessary to address any potential violations after the contract is implemented.

Once a supplier enters our supply chain, Nielsen uses its best endeavors to ensure ongoing supplier compliance with our human rights policies through our Global Procurement organization, which provides appropriate oversight through planning, control, monitoring, measurement, corrective action, auditing, review and reporting. To date, we are aware of no cases of modern slavery or forced labor that have been found in Nielsen's operations or supply chain.

Nielsen regularly collects data on strategic suppliers who are core to our business using third-party supplier self-assessments. The first self-assessment gathers information generally about strategic suppliers' environmental, social and governance (ESG) policies at the company level. It also verifies supplier disclosure with documentation such as written company policies, third-party certifications, and membership or adherence to widely recognized industry standards such as the RBA, along with media and nongovernmental (NGO) reports. From these data points, a scorecard is generated on ESG risks for our strategic suppliers.

Nielsen completes these risk assessments and verification for our top strategic suppliers annually. Based on these assessments, Nielsen determines mitigating actions and corrective action plans with those suppliers. This assessment process was maintained with our top 100 suppliers located in nine countries in three global regions in 2022, covering approximately 77% of our spend under management.

To address social and human rights risk in our electronics factories, Nielsen regularly collects company- and facility-level data through two specific social compliance questionnaires geared towards electronics manufacturers, along with dialogue and third-party due diligence to assess risks and identify further action, such as the need for social audits. We collected this data in 2022 with our Tier 1 meter manufacturing suppliers. We analyze the results every year and follow up with specific corrective action plans as necessary. After analyzing 2022 data, we found no substantial issues of concern, and our goal is to maintain our current level of engagement for 2023, which occurs throughout the year on ESG and other issues.

Typically, Nielsen's Global Procurement team engages with contract manufacturers several times per year through regularly scheduled on-site factory visits, conference calls and meetings. While on-site visits continued to be prohibited due to the pandemic, open communication at the company and production facility level was ongoing and consistent in 2022 with our manufacturing partners.



Our effectiveness in protecting human rights across our business and supply chain

We use a variety of performance indicators to measure our progress and performance as it relates to protecting human rights throughout our business, operations and supply chain. As detailed in this document, we actively measure our suppliers' performance and progress across a range of ESG areas, including human rights-related risks. As it relates to our business, we regularly monitor human rights risks that may be raised through our internal audits, as well as through the functional areas with some form of dedicated responsibility to protecting human rights across our organization.

We are committed to regularly sharing updates with our stakeholders and the general public on our approach to addressing human rights-related risks and opportunities across our business and supply chain, through resources such as our [Nielsen ESG Report](#) and regular communications via [our website](#). This statement is made pursuant to section 54(1) of the United Kingdom *Modern Slavery Act 2015* and Australian *Modern Slavery Act 2018*. It constitutes our anti-slavery and human trafficking statement covering all of Nielsen for the financial year ending 31 December 2022.

Signed for and on behalf of Nielsen Holdings Limited.**

Director Name: David Kenny

Director Signature: 

Date: 20 April 2023

*Unless prohibited by local law.

**Nielsen Holdings Limited is the reporting entity, for the purposes of the Australian *Modern Slavery Act 2018*.

About Nielsen

Nielsen shapes the world's media and content as a global leader in audience measurement, data and analytics. Through our understanding of people and their behaviors across all channels and platforms, we empower our clients with independent and actionable intelligence so they can connect and engage with their audiences—now and into the future.

Nielsen operates around the world in more than 55 countries. Learn more at www.nielsen.com and connect with us on social media (Twitter, LinkedIn, Facebook and Instagram).

