



MODERN SLAVERY STATEMENT

Under the Modern Slavery Act 2018 (Cth)

This Modern Slavery Statement has been prepared by WPP AUNZ Pty Ltd (ACN 001 657 370) of Level 4, 65 Berry Street, North Sydney, NSW, 2060 (**WPP AUNZ**), in fulfilment of its and its subsidiaries' obligations under the Modern Slavery Act 2018 (Cth).

This statement covers the following reporting period: the calendar year ending 31 December 2023. It describes our commitment and steps taken to mitigate modern slavery in our business operations and supply chain.

This statement was approved by the board of WPP AUNZ on 5 June 2024.

A handwritten signature in black ink, appearing to read 'Rosemary Herceg', written in a cursive style.

Rosemary Herceg

WPP President

Australia & New Zealand

Introduction

WPP AUNZ 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 in Australia and New Zealand is a wholly owned, indirect subsidiary of WPP plc (**WPP**). WPP plc is a reporting entity under the Modern Slavery Act 2015 (UK) (the **UK Act**). WPP plc's Modern Slavery Statement, which covers the obligations of WPP plc and its subsidiaries (together the **WPP Group**) under the UK Act can be found [here](#).

This Modern Slavery Statement for Australia and New Zealand, lodged pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**), addresses the Act's mandatory reporting criteria, including our continued identification of modern slavery risks in our operations and supply chains and actions we've undertaken to address and mitigate these risks.

Respect for human rights is a fundamental principle for the WPP Group 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.

We know that modern slavery exists in almost every country in the world. An estimated 28 million people were in forced labour in 2021, and more than \$450 billion of goods imported into the G20 were at risk of modern slavery, according to the latest Global Slavery Index. Around the world, modern slavery risk (both forced labour and forced marriage) is on the rise, driven by increased armed conflict, environmental degradation linked to climate change and the ongoing social and economic impacts of the Covid-19 pandemic. These factors have disrupted education and employment and driven a rise in forced and unsafe migration and extreme poverty.

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

The work we do for our clients has the power to bring about change – it regularly changes attitudes, opinions and the way people behave. It is critical that these changes are for the better and we are committed to maintaining the highest standards of honesty and integrity, and acting ethically in all aspects of our business.

We support our clients to integrate sustainability into their strategies, communications, and marketing as they focus on translating targets into tangible change.

We also recognise that our sphere of influence gives us a unique opportunity to support and acknowledge our local communities. In 2023, WPP completed its 'Reflect' Reconciliation Action Plan (RAP), which outlined our total commitment towards a more diverse, equitable and inclusive future - with reconciliation at the heart of our ambitions. The plan, which was formally endorsed by

Reconciliation Australia, paid respect to the rich culture of Aboriginal and Torres Strait Islander peoples and focused on preparing our organisation for engagement in reconciliation efforts. It enabled us to deepen our understanding of our sphere of influence and the unique contributions WPP can make to lead progress across the five dimensions of reconciliation: race relations; equality and equity; institutional integrity; unity; and historical acceptance. As part of this, during 2023 WPP sponsored the interactive, state of the art 'Burra Learning Place' at the Australian Museum, as well as took an affirmative stance on The Voice referendum.

At the end of 2023, we submitted our second 'Innovate' Reconciliation Action Plan to Reconciliation Australia for endorsement, which outlines actions for furthering our reconciliation efforts, due to launch at the end of Q1, 2024 and run for a two year period.

GroupM, WPP's media investment agency, places over \$60 billion of advertising in the media each year globally. 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.

You can find out more information about our business [here](#).

Part One: Business Structure, Operations and Supply Chains

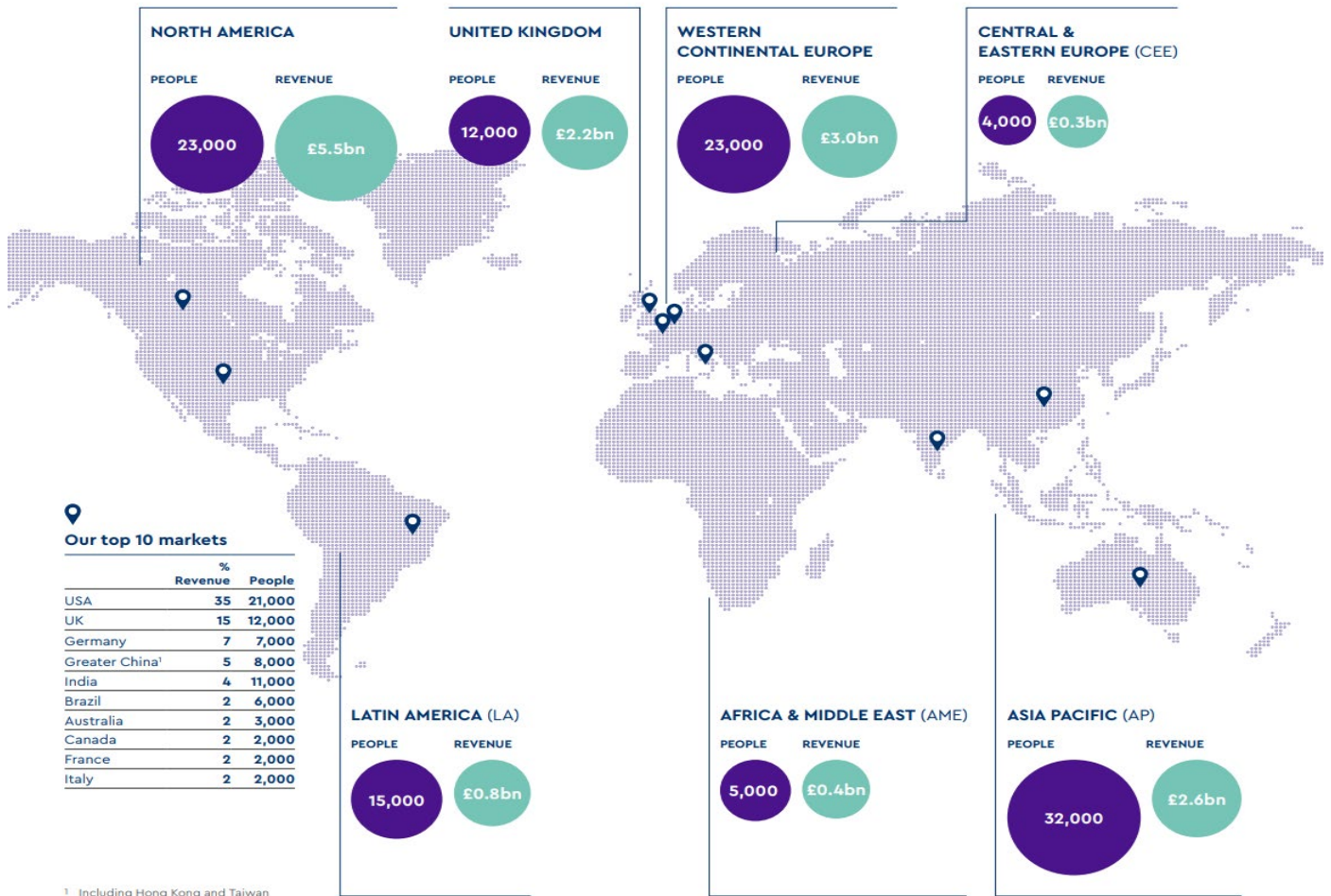
Our Structure

The mandatory reporting entity under the Act is WPP AUNZ. The complete list of WPP AUNZ 's owned and controlled entities as at 31 December 2023 is set out at Appendix 1 to this Statement.

Our Operations

WPP and our agencies employ 114,000 people in over 100 countries across the globe and work with clients including 303 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:



WPP have offices in most major cities in Australia and New Zealand. We continue to operate using our established campus system, which is an operating model and structure that encourages extensive collaboration between various co-located brands.

The approximate breakdown of the local employees and offices:

- Australia - 7 offices, 7 campuses and 2500 employees
- New Zealand - 2 offices, 2 campuses and 325 employees

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. 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.

Our workforce also includes independent contractors which are sourced from employment platforms and recruitment agencies.

As part of the global structure, some management, IT, procurement, legal and other support services are provided by the WPP Group outside of Australia.

Our Supply Chain

WPP are committed to creating a sustainable, ethical, and diverse 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. WPP works with more than 68,000 parent companies across our supply network. Goods and services are sourced from both Australia and overseas.

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 & marketing services, production and media.

Part Two: Assessing Risks of Modern Slavery Practices

Risk Assessment

We are continually assessing supply chain risk based on country, industry sector, categories of goods and services, and individual suppliers.

We continue to enhance and improve our procurement ecosystem and infrastructure through an extensive procurement transformation programme to optimise how we buy. Led by our Chief Financial Officer and Chief Procurement Officer, the programme, once complete, will facilitate full life-cycle mapping and traceability across WPP's Tier 1 supplier network.

As part of this programme, in 2023:

- We launched a new Supply Risk Management Framework, a more efficient and effective methodology to identify, assess, and prioritise a broad spectrum of risks within our indirect category supply chains. With the aid of this framework, we are better equipped to develop and implement efficient and effective risk management plans.
- We overhauled and improved our Procurement Policy and our Supplier Due Diligence Processes, leading to a more standardised and consistent approach to upfront supplier risk assessment.
- We partnered with SlaveCheck (see box, below) to strengthen how we identify and manage modern slavery risk in our indirect supply chain.
- We commenced a human rights due diligence exercise across selected indirect procurement category value chains at higher risk of potential exposure to human rights infringements. The results of this due-diligence exercise will provide greater visibility and transparency across our Tier 1 suppliers. These insights will help us to refine our risk assessment and management methodology, strengthening and, if necessary, adding to our current human rights safeguards and mitigation efforts.
- We continue to standardise and enhance numerous processes and systems, including those around supply risk management, procurement policy compliance, contract lifecycle management (CLM) and supplier onboarding and supplier relationship management (SRM). And we will implement new controls and processes that are critical to a robust and responsible sourcing programme, while also providing support through regular policy training.

Harnessing 'collective intelligence' to identify risk

To further strengthen how we identify and manage modern slavery risk in our indirect supply chain, WPP has partnered with SlaveCheck, a profit-for-purpose organisation that makes use of powerful SaaS-based 'Collective Intelligence' technologies to identify and flag any potential slavery risks or incidences within global supply chains. We believe that given the depth, complexity and global reach of our supply chains, this tool – which we will pilot in 2024 – will be an invaluable aid in identifying the higher risk areas in our Supply Chains, resulting in a more focused and effective approach to prevention efforts.

Reporting Risks in our Operations or our Supply Chains

We have not received any reports of actual or suspected instances of modern slavery in our operations during the reporting period.

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 WPP plc's Group Chief Counsel and General Counsel, Corporate Risk 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 WPP's Business Integrity team which works across all WPP companies, including in Australia and New Zealand, and who receive a number of reports through emails, calls, texts and in-person appointments.

RISK IMPACT FROM WHISTLEBLOWER REPORTS 2023

All whistleblower reports received by WPP plc's Group Chief Counsel and General Counsel, Corporate Risk, which includes all Right to Speak reports from WPP in Australia and New Zealand, are handled in line with WPP's Whistleblowing and Investigations Protocols. These are logged, investigated, and tracked through to a conclusion including any remediation or follow-up actions that might be required.

Every report received from a whistleblower is investigated and reported into the Audit Committee by WPP's business integrity function.

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 team and implemented together with the support and input of WPP's Risk Committees, including the WPP Australia and New Zealand Risk Committee. Recommended remediation can include disciplinary action, changes to systems, controls and processes or wider review and monitoring for a particular period.

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 are 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 2023, a total of 612 reports were received from whistleblowers. All reports were followed up, investigated where appropriate by our business integrity team, and reported to the Audit

Committee. None of these reports was linked to concerns of human rights or modern slavery. The most commonly raised concerns were about respect in the workplace and protection of WPP's assets.

Part 3: Actions to Address Risks

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 impacts (such as anti-bribery and corruption) and other sustainability issues.

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

In addition to signing up to our Code of Conduct, WPP suppliers are also required to complete an onboarding questionnaire which includes specific questions pertaining to modern slavery practices.

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 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 our people are required to uphold our Business Code of 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 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.

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.

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.

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 January 2023.
- Our Procurement Policy was updated in 2023 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.

Training & Awareness

All our people (including freelancers working for more than four weeks) are required to complete our online ethics training, How We Behave, promptly upon joining and then on an annual basis thereafter. Topics covered include diversity, human rights, anti-bribery and corruption, conflicts of interest and avoiding misleading work.

WPP has issued guidance and training materials on modern slavery for our

businesses to communicate to relevant people in their operations, such as HR Directors. In 2023, our global procurement team developed and launched a new mandatory Modern Slavery training module,

which all WPP procurement employees successfully completed. The training 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 2023-2024, more than 100,000 employees, freelancers and contractors completed online ethics training.
- We commenced a refresh our ethics training, including an update to the sustainability module which covers human rights and modern slavery. This activity will be finalised in 2024.
- All members of our global procurement team successfully completed refreshed mandatory Modern Slavery and Human Rights training. New team members will complete the training as part of their induction.

Part Four: Mapping our Progress

	In 2022 we stated that:	Progress to date:	Next steps:
Identifying and managing the risk of modern slavery	<p>In 2022, we concluded the roll out of a modern spend analytics tool across the majority of WPP markets.</p> <p>During 2022 the procurement team went through a transformation programme; there are now clearly defined category teams working towards in depth analysis of the supplier landscape with a view to completing that review in 2023.</p>	<p>New Supply Risk Management Framework launched: a more efficient and effective risk assessment methodology.</p> <p>Human rights due diligence exercise commenced.</p> <p>Overhauled and improved Procurement Policy and Supplier Due Diligence Processes.</p>	<p>In 2024, we will roll out a new Source to Contract IT Platform, intended to automate, standardise and streamline many of our currently manual procurement processes and systems relating to supply risk management, procurement policy compliance, contract lifecycle management and supplier onboarding and supplier relationship management.</p>
Awareness and training	<p>In 2022, we undertook to launch a refresher training module on Modern Slavery and Human Rights for the Global Procurement team and refresh our ethics training, including an update to the sustainability module which covers human rights and modern slavery.</p>	<p>Mandatory modern slavery training introduced for group procurement and completed by all team members in 2023.</p>	<p>As part of the onboarding process new joiners will undertake mandatory modern slavery training, with periodic refresher training for the procurement team</p>
Monitoring	<p>Right to speak: In 2022, we reviewed and followed up concerns received through our Right to Speak facility. We received a total of 372 whistleblower reports, none of which identified modern slavery.</p>	<p>Right to speak: In 2023, we reviewed and followed up concerns received through our Right to Speak facility. We received a total of [xx] whistleblower reports, [none] of which identified modern slavery.</p>	<p>Ongoing monitoring: We will continue to address concerns received from stakeholders.</p>

Part Five: Consultation with controlled entities & other relevant information

During the reporting period, our Modern Slavery Working Group has consulted with all owned and controlled entities' Governance Committees to understand any actual or perceived risks over Modern Slavery as well as to confirm if they had received any reports of any actual modern slavery identified in their operations or supply chains. No reports had been received during the reporting period.

Our modern slavery response is uniform across all our subsidiary entities. The operational activity and core supply chains of all subsidiaries have adopted a streamlined approach for consistency.

Appendix 1: List of Subsidiaries during the reporting period

COMPANY	Country of Incorporation/ ormation
Acceleration Consulting Pty Ltd (formerly Evocatif Pty Ltd)	Australia
AKQA Limited	New Zealand
AKQA Media Pty Ltd	Australia
AKQA Pty Ltd	Australia
Badjar Ogilvy Pty Ltd (i)	Australia
Barton Deakin Pty Limited	Australia
Blaze Advertising Pty Ltd	Australia
Boxlink Pty Ltd (i)	Australia
Brand Communications Pty Ltd	Australia
Brand Power Pty Ltd	Australia
Brand Power Inc	Canada
TBPC Sdn Bhd	Germany
Buchanan Advertising (Malaysia) Sdn. Bhd	Malaysia
Brand Power Limited	United Kingdom
The Brand Power Company LLC	USA
The Brand Power Company Pte Ltd	Singapore
Buchanan Licencing Singapore Pte Ltd	Singapore
Burson Cohn & Wolfe Pty Ltd	Australia
Cannings Advisory Services Pty Limited	Australia
Commercial Creativity Limited (i)	New Zealand
Designworks (NZ) Limited	New Zealand
Essence Global Australia Pty Ltd	Australia
EssenceMediacom Australia Pty Ltd	Australia
EssenceMediacom New Zealand Limited	New Zealand

Ethnic Communications Pty Ltd	Australia
George Patterson Partners Pty Ltd (i)	Australia
GroupM Communications Pty Ltd	Australia
GroupM New Zealand Limited	New Zealand
GTB Australia Pty Ltd	Australia
Hawker Britton Group Pty Ltd	Australia
Hill and Knowlton Australia Pty Ltd	Australia
Hogarth Australia Pty Ltd	Australia
Human Communications Pty Ltd (i)	Australia
Ikon Communications (Melbourne) Pty Limited (i)	Australia
Landor & Fitch Pty Ltd	Australia
L'Atelier Media Pty Ltd	Australia
Life Agency Pty Ltd	Australia
M Media Group Pty Ltd	Australia
Marketing Communications Holdings Australia Pty Ltd (i)	Australia
Markitforce (Melbourne) Pty Ltd (i)	Australia
Markitforce Pty Ltd (i)	Australia
Mediacom Australia Pty Ltd	Australia
Mindshare New Zealand Limited	New Zealand
Mirum Pty Ltd (i)	Australia
Motivator Media Pty Ltd	Australia
Neo Media Australia Pty Ltd	Australia
Ogilvy Action 2012 Pty Ltd (i)	Australia
Ogilvy Australia Pty Ltd	Australia
OGILVY BHD PTY LTD	Australia
Ogilvy Health Pty Ltd	Australia
Ogilvy International Limited	New Zealand
Ogilvy PR Pty Ltd	Australia

Outrider Australia Pty Ltd	Australia
Picnic Software Pty Ltd (i)	Australia
Prism Team Australia Pty Ltd (i)	Australia
PT Bullseye	Indonesia
PT Home Tester Indonesia	Indonesia
Red Tape Commercials Pty Ltd (trading as OgilvyX)	Australia
Research International Australia Pty Ltd (i)	Australia
Salmon Asia Pacific Pty Ltd (i)	Australia
Sibling Agency Pty Ltd	Australia
Singleton Ogilvy & Mather (Holdings) Pty Limited	Australia
STW Geometry Holdings Pty Ltd (i)	Australia
STW Group Asia Holdings Pte Ltd	Singapore
STW Media Services Pty Limited	Australia
The Brand Agency Limited (NZ)	New Zealand
The Brand Agency Pty Ltd ATF Brand Agency Unit Trust	Australia
The Store WPP AUNZ Pty Ltd (i)	Australia
The WTA Group Pty Ltd	Australia
VML Digital Pty Limited (i)	Australia
VML New Zealand Limited (formerly VMLY&R Limited)	New Zealand
VML Australia Pty Ltd (formerly VMLY&R Pty Limited)	Australia
Wavemaker Australia Pty Ltd	Australia
Wavemaker New Zealand Limited	New Zealand
whiteGREY Pty Ltd	Australia
WPP AUNZ GR Pty Ltd	Australia
WPP AUNZ Pty Ltd	Australia
WPP Australia Holding Pty Ltd	Australia
WPP Holdings (New Zealand) Limited	New Zealand
WPP Large Format Production Pty Ltd	Australia

WPPAUNZ Analytics Pty Ltd	Australia
WPPAUNZ Team Red Pty Ltd	Australia
Wunderman Thompson NZ Limited	New Zealand
Wunderman Thompson Pty Ltd	Australia
Young & Rubicam Group Pty Ltd (i)	Australia

(i) The entity was deregistered during the reporting period.