

Political Activities and Engagement Policy

WPP and its agencies engage in the political process on behalf of clients and to influence the political debate on issues that affect our own business interests.

Political engagement is a legitimate activity when conducted responsibly, ethically and transparently. This policy applies to employees, directors and entities of all WPP agencies and to any third parties involved in political activities on behalf of WPP and its agencies. It applies to all political activities whether carried out on behalf of clients or on behalf of WPP and its agencies.

Political activities may include:

- meetings, interactions and communications with government officials, legislators and other political organisations;
- undertaking client work designed to influence opinion on behalf of political parties, organisations and interest groups;
- political contributions;
- membership of business and trade associations that conduct lobbying on behalf of their members; and
- recruitment of employees from the public sector.

Principles for political engagement

Anyone involved in political activities on behalf of WPP or its clients are expected to abide by all relevant laws and our Code of Business Conduct. They must uphold our commitment to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity.

Political activities should be conducted legally, ethically and transparently. All communication should be honest, factual and accurate.

Political activities should focus on issues that directly affect our business or, in the case of work for clients, on issues that directly affect our clients or their customers. Political activity should not be conducted for personal gain.

WPP and its agencies must not undertake client work that is intended or designed to mislead. We do not represent 'front groups' (organisations which purport to be independent NGOs but are controlled by another organisation for the purpose of

misleading) and must ensure we are aware of who the underlying client is before taking on work.

In the US, WPP agencies whose sole or primary business is lobbying should have representatives of both major political parties among senior management. In other markets, WPP agencies should seek to ensure balanced political representation among senior management or between WPP agencies in a particular jurisdiction.

WPP agencies are required to disclose lobbying activities and expenditures via national or regional lobbying registers, where such mechanisms exist. For example, the US Lobby Disclosure Act and the Foreign Agent Registration Act and the EU Transparency Register of lobbying activities.

Working with third parties

Any third parties conducting political activities on behalf of WPP, or its agencies must comply with this policy. Third parties should complete the WPP ethics training or equivalent training within their own organisation. WPP agencies must conduct due diligence of third parties before appointment (using the WPP approved due diligence platform, Nexis Diligence which is available to all agencies), communicate our standards and monitor third-party compliance with our policies.

Political donations

WPP's policy is that no agency in the European Union or the UK is permitted to make any political donation.

In this context, donations include cash, cash equivalents, loans, gifts, entertaining, free or below market value work, sponsorship of political events etc, and anything else that constitutes a transfer of value.

Political donations are donations to the following groups:

- a registered political party or a party that intends to participate in an election(s) to a public office; and
- an organisation whose activities may be regarded as intending to affect public support for any political party (as above) or any independent candidate(s) at an election for public office.

WPP and its agencies in other jurisdictions are not permitted to make direct cash donations. Other political donations can only be made with the prior written approval of WPP's CEO. Agencies must always adhere to local laws or any other applicable laws that may prohibit or otherwise restrict such donations. Donations must be reported to WPP Legal before they are made to confirm they comply with this policy and to obtain the necessary approvals.

Political contributions should be used appropriately and in a balanced way so as to not disproportionately advantage any specific party or political viewpoint. WPP companies must also apply the ABC & Fraud Policy, Business Integrity ABC & Fraud Booklet, Adviser Payment Policy and other applicable WPP policies.

In some jurisdictions, activities such as attendance at political party conferences and events are classed as political contributions. Agencies must go through the approvals process outlined above before attending such events and making these types of contribution.

If any agency is in any doubt as to whether a donation is political or is permitted, you must contact WPP Legal.

Where political donations are permitted and have been made, the amounts will be disclosed by WPP.

Penalties for illegal political donations or non-disclosure of permitted donations range from potential custodial sentences to the requirement for full reimbursement of donations by the agency's directors. WPP will recover any monies reimbursed by the directors from those responsible for making the unapproved donations.

Trade associations and memberships

WPP and its agencies are members of trade associations, business chambers of commerce and industry groups, which may undertake lobbying activity on behalf of their members.

It is important that all such organisations act honestly, ethically and transparently in their lobbying activities. WPP agencies should select organisations whose priorities and values are aligned with those of WPP and which have robust governance processes. WPP agencies should not support organisations whose priorities conflict with our own or whose actions could constitute a reputational risk to WPP or our clients.

WPP agencies must nominate a senior manager with responsibility for managing and overseeing trade association relationships. They are responsible for conducting due diligence on memberships, communicating our key policies (including this policy, our Code of Business Conduct, Sustainability Policy, and Human Rights Policy Statement) and regularly reviewing activities.

WPP HQ memberships are overseen by WPP's Chief Sustainability Officer.

Employment of current or former government officials

WPP agencies must implement clear procedures for the employment of serving or former politicians.

When recruiting new employees directly from elected office a 'cooling off' period of six months should be implemented, or such longer period as may be required in the jurisdiction in which the agency operates. During the cooling off period, the new employee should not work on any projects directly related to their previous role or conduct discussions on behalf of the agency with their former department.

Secondments between WPP and its agencies and government departments are permitted provided that a formal agreement is put in place and a review has been carried out to ensure the secondment will not create a conflict of interest.

WPP agencies must report secondments to WPP's Chief Sustainability Officer .

Raising a concern

Anyone with concerns about any political activities undertaken by WPP or its agencies should contact WPP Legal or our confidential Right to Speak hotline.

This policy should be considered in conjunction with other relevant policies. These include:

- Code of Business Conduct
- Sustainability Policy
- Human Rights Policy Statement
- ABC & Fraud Policy
- Business Integrity ABC & Fraud Booklet
- Adviser Payment Policy
- Gifts and Entertainment policy
- Related Parties & Conflicts of Interest Policy

Disclosure and penalties

Where political donations are permitted and have been made, the amounts must be disclosed in WPP's annual report. WPP will use the requests for pre-approval as above as an initial basis for this disclosure.

If any agency is in any doubt as to whether a donation is political or is permitted, you must contact WPP Legal, as penalties for illegal political donations or non-disclosure of permitted donations are severe and can result in criminal prosecution for the agency and individuals involved.