

WPP MODERN SLAVERY STATEMENT 2025

The following statement has been prepared in fulfilment of WPP plc ("WPP") and its subsidiaries obligations under the Modern Slavery Act 2015.¹ This statement covers the financial year 2025 and describes our commitment and steps taken to mitigate modern slavery in our business and supply chain.

Approved by the Board on 8 May 2026

Signed:



Cindy Rose
Chief Executive Officer
WPP plc

INTRODUCTION

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.

Modern slavery covers a set of legally defined concepts, including forced labour, human trafficking, slavery and slavery-like practices. It encompasses situations of exploitation that an individual cannot decline or depart from due to threats, violence, coercion, deception or abuse of power.

Modern Slavery exists in almost every country in the world regardless of income.² In 2021, an estimated 50 million people were living in modern slavery, an increase of 10 million since 2016, according to the latest [Global Slavery Index](#). The G20 nations, which account for more than 75 per cent of global trade, collectively import goods at risk of modern slavery valued at US\$468 billion per annum.³

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. Find out more about our business [here](#).

¹ In 2025, the following subsidiaries fall within scope of the UK Modern Slavery Act 2015: AKQA, Burson, Hogarth, Landor, Ogilvy, Spafax, VML and WPP Media

² Walk Free, What is Modern Slavery?, Accessed 8 April 2026

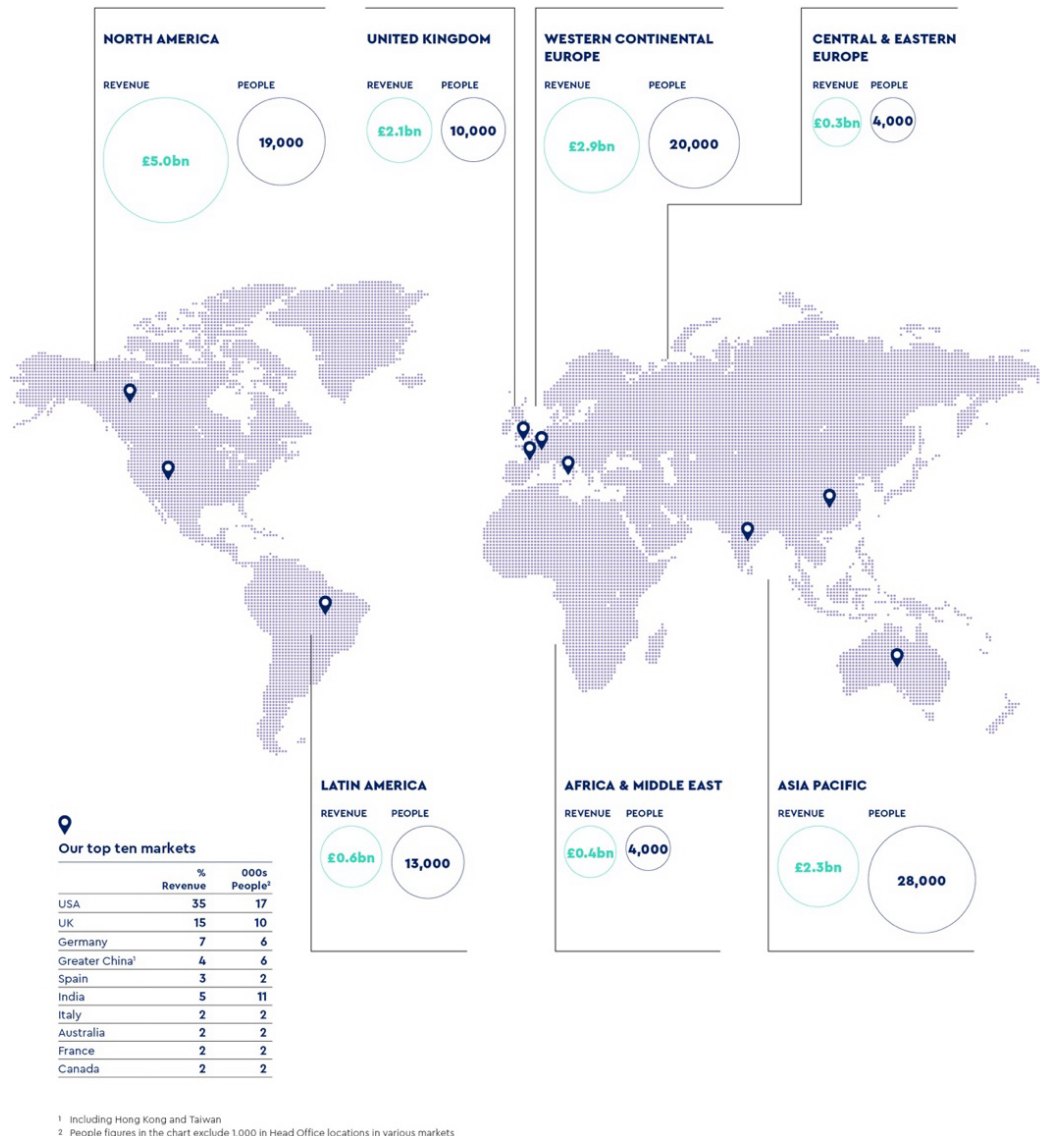
³ The Global Slavery Index 2023, Walk Free, 2023

ORGANISATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

OUR OPERATIONS

WPP and our agencies employ 99,000 people in 100+ markets across the globe. We have a diversified client portfolio that covers every business sector. We are an established partner to a large number of the world's leading advertisers. WPP is listed on the London Stock Exchange and NYSE.

Here we show our presence by region in terms of revenue and people:



MEETING LOCAL DUE DILIGENCE REQUIREMENTS - WPP AUNZ AND WPP GERMANY

In line with the Australian Modern Slavery Act 2018 and the 2021 German Supply Chain Act (LkSG), WPP AUNZ and WPP Germany have publicly reported on their own due diligence systems to identify and address modern slavery risks in their own operations and supply chains. For more information, read AUNZ's Modern Slavery Statement, available [here](#), and Germany's Declaration on Respecting and Upholding Human Rights, available [here](#).

HOW WE ARE ORGANISED

<p>Brings together AI-driven media, data and partnership capabilities to deliver creative personalisation at scale.</p>	<p>Unifies WPP's production capabilities into a single global operating unit, to deliver content at speed and scale.</p>	<p>Brings together customer experience, commerce, CRM, content transformation and technology and data platforms into a unified global operating unit.</p>	<p>The home of WPP's iconic agencies, connected through a unified leadership structure and WPP Open.</p>

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 suppliers across our supply network across all major regions, including North America, Latin America, Europe, Middle East & Africa, and Asia Pacific. Our suppliers fall into two main categories:

	Categories of spend (listed in order of size), including examples of sub-categories
Direct suppliers (those providing goods and services used in client work)	<p>Media: Media Planning and Buying, Display/ Programmatic, Media auditing</p> <p>Advertising and marketing services: Public Relations, Advertising Campaign Development</p> <p>Production: Live Action Production, Digital Production</p>
Indirect suppliers (those providing goods and services used to run our companies)	<p>Technology: IT Services, Infrastructure & Cloud, Software</p> <p>Professional services: Financial Services, Research & Insights, Tax Services</p> <p>Talent: Talent Acquisition</p> <p>People Services: Health, Wellness & Benefits, Compensation, Talent Development</p> <p>Real Estate: Real Estate Services, Capex and Fit-out</p> <p>Travel: Travel, Expenses</p> <p>Facilities Management: Office Services, Cleaning & Janitorial, Catering</p>

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 2025 Annual Report, from pages 50-51.

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 Policy Statement, for approval by the Board.

Our Procurement Risk Committee is responsible for governance, oversight, and risk management in indirect procurement activities, thereby strengthening risk monitoring and 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.

Operational implementation of risk management processes and measures lies with the responsible departments, such as procurement. Our Human Rights Officer – a new role created in 2025 – monitors and reviews due diligence implementation, such as our annual risk assessments, and develops relevant methodological approaches.

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 pages 50-51 of our 2025 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.

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. We set a clear policy framework, which our agencies are required to follow. Key policies relating to modern slavery are summarised in the table below.

With the exception of our Supplier Code of Business Conduct, which is directed at our suppliers, our policies apply to all employees of any of our group subsidiaries. These Policies are accessible via our intranet and changes are communicated through training and internal communications. A selection of these policies is also publicly available on our website.

We conduct regular reviews to ensure that our policies are kept up-to-date and compliant with international and national regulatory frameworks. 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.

Policies
<p>ASSIGNMENT ACCEPTANCE POLICY AND FRAMEWORK Guides our leaders and people on additional due diligence in relation to clients and any work we are asked to undertake.</p>
<p>CODE OF BUSINESS CONDUCT Sets out our responsibilities to our people, partners and shareholders to act ethically, legally and with integrity.</p>
<p>CODE OF BUSINESS CONDUCT – SUPPLIER VERSION Sets out our expectations that our suppliers act ethically, legally and with integrity.</p>
<p>HUMAN RIGHTS POLICY STATEMENT Reflects international standards and principles, including the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights.</p>
<p>PROCUREMENT POLICY Outlines a clear procedure for responsible procurement and sets out relevant ESG-related due diligence processes.</p>
<p>SUSTAINABILITY POLICY Sets out our values, commitments and further policies and frameworks to give us a balanced focus across environmental, social and governance issues.</p>
<p>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.</p>

ASSESSING AND MANAGING RISKS IN OUR OWN OPERATIONS

We perform annual desk-based risk assessments of our direct operations by leveraging authoritative sources.⁴ In this context we have noted that WPP has a physical presence and business operations in regions at 'high risk' of modern slavery.⁵ 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.

All hiring must go through WPP's established People Team procedures. WPP's People Team will involve WPP's Business Integrity Team if they consider the potential hiring raises a legal or ethical concern. Additionally, we encourage all current and prospective employees to voice any concerns through our grievance mechanism. See page 8 for more info on our Right-to-Speak Channel.

ASSESSING AND MANAGING RISKS IN OUR SUPPLY CHAIN

We annually review supply chain risks, considering country, industry sector, categories of goods and services, and individual suppliers, using reputable country indices and sector studies as well as third-party risk databases for specific company information.

Most of our procurement relates to professional services, technology and creative production from established suppliers in regulated markets. However, within this generally lower-risk environment, we recognise that some of our spend carries comparatively higher⁶ exposure to modern slavery risks:

- Categories at higher risk: sectors with known vulnerabilities to forced labour, such as IT hardware manufacturing (due to risks in component sourcing and assembly), facilities management (which often involves subcontracting of cleaning, security and maintenance services), hospitality (where workers may be subject to exploitative practices) and promotional merchandise production (which may involve complex, opaque supply chains).
- Geographies at higher risk: countries identified by relevant sources – such as the Global Slavery Index and ILO Research – as having a higher prevalence of modern slavery. This may be due to ineffective enforcement, weak labour protections, or socio-economic conditions that enable exploitation.

⁴ This includes country indices and industry studies such as Walk Free Foundation's Global Slavery Index, UNICEF's Children's Rights in the Workplace Index and ILO data and research on forced labour.

⁵ Global Estimates of Modern Slavery, ILO, Walk Free and IOM, 2022

⁶ When we refer to "higher risk" suppliers or spend, we mean those with comparatively elevated exposure to modern slavery risks relative to our overall low-risk supply chain profile.

DUE DILIGENCE IN OUR SUPPLY NETWORK

WPP Procurement carry out due diligence on our indirect suppliers with spend over \$100,000 to help us select suppliers that meet our requirements when it comes to doing business responsibly. Due diligence includes assessing information about the supplier's adherence to regulatory, ethical and environmental, social and governance (ESG) factors. This rigorous assessment is designed to identify and mitigate potential risks before entering into a business relationship. For certain contracts, additional advanced due diligence is required in the form of satisfactory completion by a reputable external and independent provider of reputation checks.

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, human rights (including modern slavery issues such as child, forced or bonded labour), social impact and other sustainability topics. Our Code of Business Conduct requires suppliers to apply similar standards within their own supply chains.

WPP seeks to negotiate and include a right-to-audit provision wherever possible in the supplier documentation and/or standard terms and conditions of contract. WPP's 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.

CASE STUDY: REDUCING VULNERABILITY THROUGH FAIR PAY

The challenge: Low wages and financial instability are primary drivers of modern slavery and exploitation. When workers cannot meet their basic needs, they become vulnerable to excessive overtime and debt bondage – key indicators of forced labor. This risk is particularly acute in indirect service categories such as cleaning, catering and security.

Our Action: WPP is 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 Real Living Wage to our people and, crucially, to all on-site contractors. This rate exceeds the statutory national minimum wage and is calculated based on the actual cost of living.

The Impact: By mandating the Real Living Wage in our contracts, we ensure that most vulnerable workers in our operations – often employed through third-party facilities management agencies – are protected against in-work poverty:

- **Financial Resilience:** Higher base pay reduces the likelihood of workers needing to take on unmanageable debt or agree to exploitative working conditions.
- **Supplier standards:** This requirement creates a commercial incentive for our relevant suppliers to maintain higher ethical standards and ensure adequate working conditions for their workers.

BEYOND OUR SUPPLY CHAIN

We will not undertake work intended to mislead on human rights issues, and we work with clients to manage human rights in marketing campaigns, ensuring for example, the protection of children's rights in relation to marketing.

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.

CASE STUDY: USING OUR VOICE FOR HUMAN RIGHTS.

The Opportunity: WPP can deploy world-class creative talent to amplify the voices of the vulnerable and support organisations fighting for human rights.

Our Action: As a founding member of Unstereotype Alliance, we partner with UN Women to work towards eradicating harmful stereotypes in media and advertising content, which can contribute to discrimination and exploitation

The Impact: Harmful stereotypes can dehumanise marginalized groups, making them more susceptible to exploitation and abuse. By working with the Unstereotype Alliance we are creating media that portrays women and marginalized groups with agency and dignity, countering conditions that allow exploitation to thrive.

GRIEVANCE MECHANISM & REMEDIATION

WPP encourages a culture of integrity and transparency, offering our employees, partners and other stakeholders along our value chain confidential (and anonymous, if desired) channels to express concerns or report suspected misconduct. Our independently managed Right to Speak facility, which is overseen by our Group Chief Counsel and General Counsel Corporate Risk, is available via phone or email in local languages [here](#). 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.

All whistleblower reports, including those from Right to Speak, are handled in line with WPP's Whistleblowing and Investigations Protocols. They are logged, thoroughly investigated, tracked to conclusion, and include any necessary remediation or follow-up actions. Reports are also analysed for risk impact and root causes, with learnings used to improve training and processes.

WPP is committed to providing a safe and confidential way for individuals to raise genuine concerns without fear of reprisal, and we do not tolerate retaliatory behavior. The nature of each report, action taken, and outcome is regularly reported to the Audit Committee, with misconduct or retaliation resulting in appropriate disciplinary action.

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, refreshed in 2025 and rolled out at the beginning of 2026, 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. Through our UN Global Compact membership, all our employees can also access free trainings and business-contextualised publications on human rights.

Tailored guidance and training materials on modern slavery are also available for relevant functions. For example, procurement employees complete mandatory modern slavery training upon joining WPP and annually thereafter. 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.

MONITORING AND EVALUATION

We aim to continually improve our approach to due diligence and risk management.

We regularly monitor and evaluate the effectiveness of our processes and measures and adapt them accordingly. In 2026, this evaluation process will focus on the use of outcome-oriented KPIs.

	In 2024 we stated that:	Progress to date:	Next Steps:
Organisational structure, business and supply chains	We established the Procurement Risk Committee to improve governance, oversight and risk management for our supply chain.	<p>We enhanced the structure and procedures of the Procurement Risk Committee.</p> <p>We appointed a Human Rights Officer to strengthen our risk management governance and methodologies.</p> <p>We restructured this Modern Slavery Statement to enhance alignment with the 2025 UK Home Office Guidance.</p>	Conduct an enhanced value chain mapping, incl. sustainability risks and potentially affected stakeholders.
Policies	We completed a review of our Procurement Policy and Sustainability Policy.	<p>We conducted our annual policy review including Procurement Policy, Human Rights Policy Statement, Sustainability Policy and Supplier Code of Business Conduct.</p> <p>Enhancements made to Procurement Policy, including additional due diligence requirements, to be rolled out in 2026.</p>	<p>Roll out our enhanced Procurement Policy in Q1, which includes additional due diligence requirements.</p> <p>Initiate a broader review of our Human Rights Policy Statement to reflect updates to our due diligence framework.</p>

Assessing and managing risks	<p>We commenced a review of the frameworks and processes used to conduct human rights assessments within our Tier 1 supply chain. We enhanced procurement processes and systems, including those around supply risk management, procurement policy compliance, CLM, supplier onboarding and SRM.</p> <p>We commenced the roll out of our new Source to Contract IT Platform and shall conclude its implementation in the first quarter of 2025.</p>	<p>We completed the roll out of our new Source to Contract IT Platform.</p> <p>We reviewed our human rights due diligence processes to enhance visibility and transparency across our Tier 1 suppliers and strengthen alignment of our risk assessment methodology with the UNGPs and the OECD Guidelines for Multinational Enterprises.</p> <p>We integrated additional data sources into our risk assessments for a deeper understanding of potential modern slavery and broader human rights risks pertaining to our procurement structure. To facilitate this, we started the development on an intuitive, data-driven dashboard that will support our risk analysis process and improve internal reporting and decision-making.</p>	<p>Finalise and commence roll out of new supply chain due diligence framework.</p> <p>This includes the implementation of the new human rights dashboard.</p> <p>Review our approach to modern slavery due diligence in relation to our business partners as they become a more critical part of our value chain.</p>
Grievance and remediation	<p>In 2024, we reviewed and followed up concerns received through our Right to Speak facility. We received a total of 609 whistleblower reports, none of which were linked to human rights concerns or modern slavery.</p>	<p>In 2025, we reviewed and followed up concerns received through our Right to Speak facility. We received a total of 589 whistleblower reports, with no reports linked to human rights concerns or modern slavery.</p>	<p>Continue to monitor and address any concerns received from stakeholders.</p>
Awareness and training	<p>For the training period 2024-2025, more than 90,000 employees, freelancers and contractors completed online ethics training. All members of our global procurement team successfully completed mandatory Modern Slavery and Human Rights training.</p>	<p>We refreshed our mandatory online ethics training, which includes human rights and modern slavery content.</p> <p>All members of our global procurement team successfully completed mandatory Modern Slavery and Human Rights training.</p>	<p>Initiate a broader review of the procurement training to ensure further alignment with international standards related to modern slavery prevention and to incorporate a broader human rights context.</p>