Modern slavery act statement

The Company is part of the Interpublic Group ("**IPG**") and IPG is one of the world's largest organisations of advertising and marketing services companies. IPG is committed to excellent corporate governance and lawful and ethical behaviour is of paramount importance and critical to its continued success. The IPG Code of Conduct and the IPG Supplier Code of Conduct require all IPG entities and employees to operate with integrity and transparency in all interactions with clients and other partners and places similar obligations upon its suppliers.

IPG is fully supportive of the laws introduced within the United Kingdom through the Modern Slavery Act 2015 to combat slavery, forced or compulsory labour and the trafficking of persons for any purpose ("**Slavery and Human Trafficking**"). IPG's Human Rights Policy requires all IPG agencies to commit strictly to the use of voluntary labour only and prohibits any form of modern slavery.

This statement is made in respect of the Company's financial year ending 31 December 2021 and is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the steps that IPG takes and intends to take to protect its businesses against all forms of Slavery and Human Trafficking.

Copies of statements made by the Company in respect of previous financial years are made available on request to the Company Secretary.

Business and structure, operations and supply chains

IPG's ultimate parent company, The Interpublic Group of Companies, Inc., is listed on the New York Stock Exchange.

As a global organisation, IPG's suppliers worldwide include, without limitation, production and design companies, IT and communications services including cloud, software and hardware suppliers, advertising platforms, social media platforms, print services, property, office cleaning, office supplies and equipment and facilities management services, including energy suppliers, waste management services, couriers, transportation services, such as road transportation, airlines and train companies, merchandise suppliers, and hospitality service suppliers including hotel conference or venue providers, catering suppliers, professional services such as auditors, actuaries, tax advisors, legal advisors, insurers, banks and talent and recruitment agencies.

Given the nature of IPG's business and the geographical location of its business and suppliers, IPG does not consider that there is a significant risk of modern slavery within its supply chains or its own businesses. The principal suppliers in our advertising business supply chain are predominantly reputable companies providing ancillary services to our advertising services for clients, such as, media owners, production companies, design companies, editing and animation studios, record companies, musicians, photographers, and also professional suppliers such as legal advisors, insurers, and talent agencies.

Relevant policies

Doing business in an ethical and responsible manner is enshrined within IPG's global policies and procedures (which apply to all IPG owned entities) and, in particular, those referred to below which have been designed to help to ensure that Slavery and Human Trafficking do not occur within any IPG entity's operations or any of their supply chains. These policies are available on IPG's public website www.interpublic.com.

- IPG Code of Conduct
- IPG Supplier Code of Conduct
- IPG Human Rights Policy
- Global Sourcing and Procurement and Third Party Supplier Due Diligence Guidelines
- Anti-Corruption Policies
- Sustainability Policy
- Interpublic Alert Line

IPG requires all its suppliers, employees, agents and subcontractors to adhere to the IPG Code of Conduct or the IPG Supplier Code of Conduct as appropriate while doing business with or on behalf of any entity within IPG. The IPG

Supplier Code of Conduct specifically requires use of voluntary labour and prohibits slavery, servitude or the use of forced or compulsory labour and human or labour trafficking and requires all suppliers to comply with applicable laws. IPG communicates this Code and its requirements to relevant management, employees and suppliers worldwide.

IPG is also a participant in the United Nations Global Compact whose labour principles include:

> Principle 3: business should uphold the freedom of association and the effective recognition of the right to collective bargaining;
>
> Principle 4: the elimination of all forms of forced and compulsory labour; Principle 5: the effective abolition of child labour; and
>
> Principle 6: the elimination of discrimination in respect of employment and occupation.

Other actions taken to address modern slavery risks

IPG sources its suppliers in a responsible manner under Global Sourcing and Procurement and Third Party Supplier Due Diligence Guidelines and fully expects and requires its suppliers to operate in full compliance with all applicable laws. Our standard terms of business attached to our Purchase Orders, and our supplier contract templates include warranties that the suppliers will comply, *inter alia*, with modern slavery laws. Under these terms, a failure by a supplier to comply with applicable laws (including as they relate to Slavery and Human Trafficking) would be a justifiable reason for such a relationship to be terminated.

When engaging suppliers, we ask them to complete a supplier questionnaire to confirm their structure, shareholdings and their agreement that they comply with our policies and Supplier Code of Conduct.

Risk control and assessment is a high priority for IPG and IPG carries out continuous reviews to improve its effectiveness. In this respect during 2021, IPG developed a new vendor on- boarding platform which includes a modern slavery assessment for suppliers. The initial vendor request includes a specific question on whether the supplier supplies services in the UK. If the supplier responds yes to that request they are asked further basic questions about modern slavery compliance and whether or not they have issued a modern slavery statement. This platform is currently operating in the USA with the intention to extend its application across IPG's wider network including the UK.

As part of our robust compliance program to ensure we are conducting business with reputable suppliers and service providers, we have also established a global third party screening solution using the LexisNexis Compliance Database. The screening is conducted on all clients and vendors/suppliers when permissible by law. IPG also uses Bureau Van Dijk Orbis and TransUnion TLOxp databases for enhanced screening. Ongoing screening is conducted on new Contractors/Suppliers/Service Providers as part of the onboarding procedures. The screening is conducted against the following criteria:

- Named on an International or National Sanctions or Embargo List or Site, including OFAC, UN, EU, UKHMT, SECO and DFAT (Global Sanctions Lists).
- Listed on a Regulatory and/or Government Authority site, e.g. FINRA, USDOJ, SEC, FBI, HKMA, RBI and INTERPOL (Global Enforcement and Warning Lists).
- Politically Exposed Person (PEP) and direct family member or close business associate of PEP (Global PEP Lists).
- State Owned Entity, Enterprise or Company (SOE) and Members of the Board, Chairman, Senior Executives (Global SOE Lists).
- Reported in the reputable media as accused, questioned, investigated, arrested, charged or convicted for crime (Global Negative Media Lists).

Due to what we perceive to be a low risk of modern slavery within our industry and due to our rigorous on-boarding processes described above, we do not consider it necessary at this stage to audit our suppliers (or indeed their suppliers) to ensure that they are compliant with modern slavery laws. However, we would be prepared to do so should the need arise.

Compliance within the business is supported by a robust Internal Audit function which regularly conducts audits of our agencies in all their areas of business and works closely with the internal Legal Department to ensure compliance with all applicable laws and regulations. Most key agencies are audited once every three years. However, where we believe there may be an issue or concern in an agency, or where we consider an agency is operating in a high risk jurisdiction, or where an issue has been raised either formally or through the Alert Line, then that agency will be subject to an enhanced audit or investigation, if necessary with third party auditors, external law firms or tax investigators.

The Interpublic Alert Line, allows our employees or other concerned parties to raise concerns about any business conduct without fear of reprisal or retribution. The Alert Line number is included on Alert Line posters in all our agencies across the world, especially those in higher risk countries. It is also available on our IPG website, is brought to the attention of our employees in our compliance training and details of the Alert Line are included in our Supplier Code of Conduct. The Alert Line allows for any concerns to be raised anonymously and every complaint or claim made on the Alert Line is investigated.

IPG continues to build upon its robust compliance culture and seeks to maintain its high standards. As part of its ongoing efforts to ensure there is no Slavery or Human Trafficking in its supply chains it intends to identify improvements by reviewing its supplier engagement policies, contractual approaches and due diligence processes to continually monitor the risk of Slavery and Human Trafficking.

Training

IPG's new hire Code of Conduct training which is provided to all new employees globally includes specific training on the risks of modern slavery and the need to carry out proper due diligence when engaging suppliers in order to ensure there is no Slavery or Human Trafficking in our supply chains.

On the basis that it remains our opinion that the risks of finding occurrences of modern slavery is relatively low risk in our supply chain, we have, as yet, not carried out additional specific modern slavery training for any of our agencies but this will be reviewed. We do conduct general compliance and Code of Conduct training on a regular basis and the risks of Modern Slavery are set out in the Code of Conduct.

Remediation

If any instances of modern slavery were identified, through an audit or otherwise, we would immediately investigate and if we found failings with the relevant supplier, we would terminate the contract/s with that supplier, ensure that none of our businesses used that supplier in the future and, where necessary, report the supplier to the appropriate authorities. No instances of modern slavery have yet been found in our supply chains.

Assessing the effectiveness of actions taken

We continue to regularly review our own policies and processes to ensure they remain up to date and effective. For example, the IPG Code of Conduct training for 2022 specifically covers the risks of Modern Slavery. The effectiveness of these processes will also be tested as part of our Internal Audit function, which extends to all our agencies.

Other information

IPG is committed to its work around environmental, social and governance (ESG) initiatives, and to supporting the communities where our employees live and work. It also strongly supports a policy of diversity and inclusion and is the first advertising holding company to release the race and gender composition of our leadership teams. In 2021, IPG was named on the Bloomberg Gender Equality Index for the third year in a row and has also been named on the HRC Equality Index for the 13th consecutive year. IPG fosters this approach throughout all its agencies across the world, including in the UK, and does not tolerate discrimination of any kind.

IPG itself makes regular charitable contributions to organisations that align with our values and encourages our agencies to do likewise.

IPG is on the Dow Jones Sustainability Index in North America. Since 2015, IPG has published sustainability reports utilising the GRI framework and was the first U.S.-based holding company to do so. IPG was the first company in its sector globally to report using the Sustainability Accounting Standards Board framework. IPG also responds to CDP and publishes an annual communication on progress for the United Nations Global Compact referred to above. IPG maps its work to the United Nations Sustainable Development Goals, and has adopted SDG 6, access to water and sanitation. Finally, IPG has set three major climate goals: setting a science-based target, working toward net zero by 2040, and achieving one hundred percent renewable electricity by 2030.

Approval -

This statement was approved by the Board of Directors of the Company.

C Buckwell

Digitally signed by C Buckwell
Date: 2023.04.03 09:44:41 +01'00'

Signature of authorised director

IPG Health Medical Communications Ltd

Dated: 20/06/2022