



# Modern Slavery Statement

## Introduction

This statement applies to S<sup>4</sup>Capital plc, and its subsidiaries (together, 'S<sup>4</sup>Capital').

At S<sup>4</sup>Capital, we take seriously our responsibility to ensure that our business is conducted in an ethical way and we actively address important social issues.

As part of this process, we have in place a Modern Slavery and Human Trafficking Policy (the 'MSA Policy'), which seeks to identify and manage slavery and human trafficking risk in our business and supply chains in accordance with the principles and goals promoted by the Modern Slavery Act 2015 and related guidance.

This statement is published in line with the United Kingdom's Modern Slavery Act 2015, and references to 'we', 'us' or 'our' are to S<sup>4</sup>Capital.

## Organisation's structure

S<sup>4</sup>Capital is a digital advertising and marketing services business, providing bespoke content, data analysis and digital media planning on a global, multinational, regional and local basis. S<sup>4</sup>Capital plc is the ultimate parent company of the S<sup>4</sup>Capital Group and has its head office in London.

S<sup>4</sup>Capital has an annual turnover in excess of £36 million.

## Supply chain and supplier due diligence

S<sup>4</sup>Capital's supply chains are relatively simple and the nature of the services it provides offers limited opportunity for modern slavery and/or human trafficking practices.

However, it is important that S<sup>4</sup>Capital continues to monitor this.

In order to support the MSA Policy, S<sup>4</sup>Capital includes additional enquiries in its procurement processes for goods, services and locations that are assessed as having a high risk of modern slavery and/or human trafficking.

In addition, as part of our initiative to identify and manage slavery and human trafficking risk:

/ we are continuing to build and improve our systems to better (i) identify, assess and monitor potential higher risk areas in our supply chains; and (ii) mitigate the risk of slavery and human trafficking occurring in our supply chains through enhanced contract term controls (to the extent appropriate and obtainable);

/ we build relationships with reputable suppliers and ensure that expectations of business behaviour are both clear and consistent; and

/ where appropriate, (i) we expect our direct suppliers to have suitable anti-slavery and human trafficking policies and processes; and (ii) we will communicate our expectation that those suppliers must prohibit modern slavery and human trafficking in the supply

chain and that they should work with their suppliers at each stage up in their supply chains to manage slavery and human trafficking risk.

### **Implementation**

S<sup>4</sup>Capital 's board of directors shall have overall responsibility for the MSA Policy and this statement. Our senior management shall also be responsible for implementing our MSA Policy and the objectives considered in this statement.

We will monitor progress of our efforts, and issues (should they arise) will be considered by S<sup>4</sup>Capital's Board of Directors who will decide on immediate and appropriate action to be taken.

### **Effectiveness**

We continue to monitor our performance against the following in order to gauge how effective we are in dealing with the risk of slavery and human trafficking in our business or suppliers:

/ implementation of the MSA Policy;

/ developing a system for supply chain identification, including, where appropriate, adding slavery and human trafficking enquiries and controls to our procurement policies;

/ where appropriate, asking specific questions on modern slavery as part of our procurement processes; and

/ seeking to include where appropriate a clause relating to modern slavery in our terms with third parties for the supply of goods and services.

### **Approvals**

It is intended for this statement to be approved by our Board of Directors in Q4 2019.

Sir Martin Sorrell

Executive Chairman, S<sup>4</sup>Capital plc