



S⁴Capital plc

Statement under the UK Modern Slavery Act for financial year ending 31 December 2020

INTRODUCTION

This statement applies to S⁴Capital plc and all of its subsidiaries, including Media.Monks (together, "**S⁴Capital**"), in compliance with the corporate reporting requirements under the UK Modern Slavery Act 2015.

Modern slavery is one of the most complex and important human rights challenges of our time. It targets the most vulnerable and preys on those who need the most support in our society.

According to the 2020 UK Annual Report on Modern Slavery, it is estimated that there are tens of millions of victims of modern slavery across the world and in 2020 alone, over 10,000 potential victims of modern slavery were identified in the United Kingdom. Slavery has resulted in victims of human trafficking, forced labour and domestic servitude often hidden in plain sight in our communities.¹

At S⁴Capital, we take seriously our responsibility to ensure that our business is conducted in an ethical way and we actively address important social issues. Media.Monks has been a member of the United Nations Global Compact since 2012. The United Nations Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with 10 universally accepted principles, including in the areas of human rights and employment.

S⁴Capital does not tolerate modern slavery. We are committed to understand and address any modern slavery risks that may arise in the course of our business. As part of this commitment, we have put in place a Modern Slavery and Human Trafficking Statement (the "**MSA Statement**") and a Supplier Code of Conduct. Together, these documents help us 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 MSA Statement is published in line with Section 54 of the United Kingdom's Modern Slavery Act 2015, and references to "we", "us" or "our" are to S⁴Capital.

ORGANISATION'S STRUCTURE

S⁴Capital is a new age/new era digital advertising and marketing services business, providing bespoke content, data analysis, digital media planning and digital transformation services on a global, multi-national, regional and local basis. S⁴Capital, and the majority of the clients it provides services to, are truly global businesses. At the date of this statement, S⁴Capital has a local presence in over 33 countries, including the UK, the United States, the Netherlands,

¹ The 2020 UK Annual Report on Modern Slavery, and further information on the issue of modern slavery, can be found on <https://www.gov.uk/government/collections/modern-slavery>.

Argentina, Australia and China. S⁴Capital plc is the ultimate parent company of the S⁴Capital Group and has its head office in London, England.

SUPPLY CHAIN AND SUPPLIER DUE DILIGENCE

S⁴Capital'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 for S⁴Capital to monitor its supply chains to help prevent and identify the risks of modern slavery.

In order to support our MSA Statement, S⁴Capital includes additional enquiries in its procurement processes for goods, services and locations that are assessed as having a high risk of modern slavery or human trafficking, including an evaluation of any internal policies and procedures such suppliers have in place.

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

- we continue to establish and improve our processes 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 will comply with our Supplier Code of Conduct and 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

Our commitment to help prevent and identify risks of modern slavery starts with S⁴Capital's board of directors, which shall have overall responsibility for our MSA Statement. Our board is supported by the S⁴Capital Audit and Risk Committee for specific oversight on specific issues involving internal and external controls and compliance with legal and regulatory requirements, including compliance with our MSA Statement. Our board shall also be responsible for implementing our MSA Statement.

We will monitor progress of our efforts, and issues (should they arise) will be considered by S⁴Capital'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 modern slavery and human trafficking in our business or suppliers:

- implementation of our MSA Statement;
- implementation of our Supplier Code of Conduct, which sets out our zero-tolerance approach to slavery and human trafficking and also helps to communicate a number of important related human rights expectations and is in the process of being rolled out to all of our suppliers;

- developing a system for supply chain identification, including, where appropriate, adding modern slavery and human trafficking enquiries and controls to our procurement policies (in accordance with our Supplier Code of Conduct);
- where appropriate, asking specific questions on modern slavery as part of our procurement processes;
- seeking to include where appropriate a clause relating to modern slavery in our terms with third parties for the supply of goods and services; and
- reporting on key performance indicators on an annual basis, including in relation to training and the roll-out of our Supplier Code of Conduct

TRAINING

We will provide regular training as necessary to educate on the importance of implementing and enforcing effective systems to ensure slavery and human trafficking is not taking place in our supply chains. This will form part of a wider programme of compliance training for all relevant members of management and those in our procurement team, which takes place on a regular basis.

APPROVALS

Our MSA Statement was approved by our Audit and Risk Committee and board of directors.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2020.

Next Review: June 2022

Martin Sorrell



Sir Martin Sorrell
Executive Chairman, S⁴Capital plc

This statement has been approved by the Board of S⁴Capital plc in compliance with the UK Modern Slavery Act.