



## **S4 Capital plc**

### **Statement under the UK Modern Slavery Act for financial year ending 31 December 2021**

#### **INTRODUCTION**

This statement applies to S<sup>4</sup>Capital plc ("S<sup>4</sup>Capital").

At S<sup>4</sup>Capital, we take seriously our responsibility to conduct business in an ethical way. 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.

S<sup>4</sup>Capital does not tolerate modern slavery. We are committed to assess and address any modern slavery risks that may arise in the course of our business. As part of this commitment, we are implementing a Supplier Code of Conduct and seeking to regularly educate our employees and staff on the risks and how to mitigate them. This helps us identify and manage slavery and human trafficking risk in accordance with the principles and goals promoted by the Modern Slavery Act 2015 and related guidance.

This Modern Slavery and Human Trafficking Statement (the "**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 S<sup>4</sup>Capital.

#### **ORGANISATION'S STRUCTURE**

S<sup>4</sup>Capital 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. S<sup>4</sup>Capital, and the majority of the clients it provides services to, are truly global businesses. At the date of this statement, S<sup>4</sup>Capital has a local presence in over 32 countries, including the UK, the United States, the Netherlands, Argentina, Australia and China. S<sup>4</sup>Capital plc is the ultimate parent company of the S<sup>4</sup>Capital Group, which includes Media.Monks, and has its head office in London, England.

#### **SUPPLY CHAIN AND SUPPLIER DUE DILIGENCE**

The nature of the services S<sup>4</sup>Capital provides offers limited opportunity for modern slavery and/or human trafficking practices. While this may be the case, S<sup>4</sup>Capital recognises it remains important to monitor its supply chains to help prevent and identify the risks of modern slavery.

S<sup>4</sup>Capital seeks to establish and improve its processes to:

- include 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;
- 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 its supply chains through enhanced contract term controls (to the extent appropriate and obtainable); and
- continue building relationships with known suppliers and ensure that expectations of business behavior are both clear and consistent.

## **IMPLEMENTATION**

Our commitment to help prevent and identify risks of modern slavery starts with S<sup>4</sup>Capital's board of directors. The S<sup>4</sup>Capital Audit and Risk Committee provides oversight on specific issues involving internal and external controls and compliance with legal and regulatory requirements, including compliance with our MSA Statement.

We monitor the effectiveness of our policies and processes and our relationships with suppliers and we regularly report to the S<sup>4</sup>Capital's board of directors, including material issues.

## **EFFECTIVENESS**

We continue to monitor our performance against the following in order to gauge how effective we are in dealing with modern slavery and human trafficking risks 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);
- asking specific questions on modern slavery as part of our procurement processes;
- seeking to include protections relating to modern slavery in our terms with third parties for the supply of goods and services;
- implementing a reporting process on key performance indicators on an annual basis, including in relation to training and the roll-out of our Supplier Code of Conduct; and
- enhancing our compliance program to include regular training on modern slavery.

## **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 as of 30 June 2021.

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 2021.

Next Review: June 2023

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**Sir Martin Sorrell**

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