

WPP Political Activities and Engagement Policy

WPP and its companies engage in the political process on behalf of clients and to influence the political debate on issues that affect our own business interests.

Political engagement is a legitimate activity when conducted responsibly, ethically and honestly.

This policy applies to employees, directors and entities of all WPP companies and to any third- parties involved in political activities on behalf of WPP and its companies. It applies to all political activities whether carried out on behalf of clients or on behalf of WPP and its companies.

Political activities may include: meetings, interactions and communications with government officials, legislators and other political organisations; undertaking client work designed to influence opinion on behalf of political parties, organisations and interest groups; political contributions; membership of business and trade associations that conduct lobbying on behalf of their members; and recruitment of employees from the public sector.

Principles for political engagement

Anyone involved in political activities on behalf of WPP or its clients are expected to abide by all relevant laws and our Code of Business Conduct. They must uphold our commitment to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity.

Political activities should be conducted legally, ethically and transparently. All communication should be honest, factual and accurate.

Political activities should focus on issues that directly affect our business or, in the case of work for clients, on issues that directly affect our clients or their customers. Political activity should not be conducted for personal gain.

WPP companies must not undertake client work that is intended or designed to mislead. We do not represent 'front groups' (organisations which purport to be independent NGOs but are controlled by another organisation for the purpose of misleading) and must ensure we are aware of who the underlying client is before taking on work.

In the US, WPP companies whose sole or primary business is lobbying should have representatives of both major political parties among senior management. In other markets, WPP companies should seek to ensure balanced political representation among senior management or between WPP companies in a particular jurisdiction.

WPP companies are required to disclose lobbying activities and expenditures via national or regional lobbying registers, where such mechanisms exist. For example, the US Lobby Disclosure Act and the Foreign Agent Registration Act and the EU Transparency Register of lobbying activities.

Working with third parties

Any third-parties conducting political activities on behalf of WPP or its companies must comply with this policy. Third-parties should complete the WPP ethics training or equivalent training within their own organisation.

WPP companies must conduct due diligence of third-parties before appointment, communicate our standards and monitor third-party compliance with our policies.

Political donations

WPP and its companies in the EU are not permitted to make political donations. This includes cash, cash equivalents, loans, gifts, entertaining, free or below market value work, sponsorship of political events, and anything else that constitutes a transfer of value.

Political donations are donations to the following groups:

- a registered political party or a party that intends to participate in an election(s) to a public office; and
- an organisation whose activities may be regarded as intending to affect public support for any political party (as above) or any independent candidate(s) at an election for public office.

WPP companies in other jurisdictions are not permitted to make direct cash donations. Other political donations can only be made with the prior written approval of a WPP executive director. Donations must be reported to WPP Legal or WPP Compliance before they are made to confirm they comply with this policy and to obtain the necessary approvals.

Political contributions should be used appropriately and in a balanced way so as to not disproportionately advantage any specific party or political viewpoint. WPP companies must also apply our Anti-Bribery and Foreign Corrupt Practices Policy.

In some jurisdictions, activities such as attendance at political party conferences and events are classed as political contributions. Operating companies must go through the approvals process outlined above before making these types of contribution.

If any operating company is in any doubt as to whether a donation is political or is permitted, you must contact WPP.

Where political donations are permitted and have been made, the amounts will be disclosed by WPP .

Penalties for illegal political donations or non-disclosure of permitted donations range from potential custodial sentences to the requirement for full reimbursement of donations by the company's directors. WPP will recover any monies reimbursed by the directors from those responsible for making the unapproved donations.

Trade associations and memberships

WPP and its companies are members of trade associations, business chambers of commerce and industry groups, which may undertake lobbying activity on behalf of their members.

It is important that all such organisations act honestly, ethically and transparently in their lobbying activities. WPP companies should select organisations whose priorities and values are aligned with those of WPP and which have robust governance processes. WPP companies should not support organisations whose priorities conflict with our own or whose actions could constitute a reputational risk to WPP or our clients.

WPP companies must nominate a senior manager with responsibility for managing and overseeing trade association relationships. They are responsible for conducting due diligence on memberships, communicating our key policies (including this policy, our Code of Business Conduct, Sustainability Policy, and Human Rights Policy Statement) and regularly reviewing activities.

WPP, the parent company, memberships are overseen by the Head of Sustainability.

WPP companies must report all memberships and membership fees to the parent company via the annual sustainability survey of WPP companies.

Employment of current or former government officials

WPP companies must implement clear procedures for the employment of serving or former politicians.

When recruiting new employees directly from elected office a 'cooling off' period of six months should be implemented, or such longer period as may be required in the jurisdiction in which a Group company operates. During the cooling off period, the new employee should not work on any projects directly related to their previous role or conduct discussions on behalf of the company with their former department.

Secondments between WPP and its companies and government departments are permitted provided that a formal agreement is put in place and a review has been carried out to ensure the secondment will not create a conflict of interest.

WPP companies must report secondments to the parent company via the annual sustainability survey of WPP companies.

Raising a concern

Anyone with concerns about any political activities undertaken by WPP companies should contact the WPP legal team or our confidential Right to Speak facility.

Responsibilities and compliance

The WPP plc Board of Directors has ultimate responsibility for political activities.

Andrea Harris, Group Chief Counsel and Head of Sustainability, has responsibility for development and implementation of our political activity policy and public reporting procedures. Mark Linaugh, chief talent officer, has overall responsibility for implementation of this policy within our public affairs companies.

The CEO and CFO in each country or region are responsible for implementing this policy at the local level.

Our internal audit team assesses compliance with this policy as part of its Group-wide audit program. The audit results are reviewed by senior management in the relevant WPP company, the Head of Internal Audit, Group Chief Counsel and Group Finance Director.

Any breaches of this policy are reported to the Audit Committee of the WPP Board of Directors.

This policy should be used in conjunction with other relevant policies. These include:

- Code of Business Conduct

- Sustainability Policy
- Human Rights Policy Statement
- Anti-Bribery and Foreign Corrupt Practices Policy
- Gifts and Hospitality policy