

KANTAR

Modern Slavery Statement

2023

This Modern Slavery Act statement applies to The Kantar Group Limited, which is publishing this statement on behalf of itself, Kantar UK Limited, Lightspeed Research Ltd., Kantar Media UK Ltd and Kantar Media Audiences Limited, pursuant to section 54(1) of the UK Modern Slavery Act of 2015 for the financial year ending 31 December 2023. It sets out the steps we have taken, and continue to take, as a business to prevent slavery and human trafficking in our own operations and supply chains.

Contents

Business Overview

We believe in the power of brand. It delivers important value and sustainable growth by strengthening connections with consumers. To help brands harness that power, we start with people everywhere, and what shapes their attitudes, behaviours and aspirations.

From brand strategy to sales performance, we blend a unique combination of expertise, advanced analytics, products and platforms, creating the most meaningful understanding of how people think and act.

Our indispensable insights and actionable advice empower our clients to make incisive tactical refinements and big strategic leaps forward. And with the strongest connections to assist our clients and add greater value to their business, shape their brands' future.

Kantar. **Shape your brand future.**

We are a global company of over **22,000** colleagues and operate in over **80 countries**. We work with over **100m respondents** and hold over **2bn data profiles**.

We work closely with our clients, partners and suppliers to deliver value. We believe that we have a role to play in addressing the social and environmental challenges society faces, both in how we operate as a business, and in helping our clients respond effectively to the challenges of the **21st century**.



2023 Business Context

The global issues caused by modern slavery exist across all sectors and industries. We acknowledge that whilst our industry is considered low risk, it is not without risk, and it is our responsibility to mitigate against potential modern slavery. Kantar is committed to ensuring that there is no modern slavery in our supply chain or any other part of the business.

Furthermore, our commitment extends to upholding and respecting human rights, and in doing so have signed up to the UN Global Compact. This includes our commitments to the elimination of all forms of forced and compulsory labour and the effective abolition of child labour, as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs). We understand that it is our duty to act in accordance with these principles and take appropriate measures to ensure the well-being and dignity of all individuals.

In 2023 continued geo-political instability provided further stimulus for large-scale migration which increases the number of vulnerable people with associated risks of modern slavery and other forms of exploitation.

Tackling and Preventing Modern Slavery

Our people are skilled professionals and are not from vulnerable groups where slavery is typically a risk, but we are aware that risk may be greater in our supply chain and in our data collection environment.

1. Risk identification

Our Group risk assessment process includes an assessment of our approach to ensure 'compliance with laws and regulations' including modern slavery.

This is monitored by the Group level Risk, Opportunities and Controls Committee. We have evaluated the likelihood and impact of modern slavery risks associated with our operations, industry and geographical locations using specialist input from the business and from external providers and sources.

Although our assessment indicates that our industry is not considered high risk we recognise the importance of this area and based on our assessment we have prioritised focus on the following most significant modern slavery risks that we face:

- Ensuring ethical practices in our supply chain including those suppliers used to provide resources
- Ensuring effective practices are in place for workers in locations where fieldworkers are used more extensively for data collection
- Continuing to monitor and respond to situations where our business operates in countries / regions which are experiencing higher risk indicators, for example due to socioeconomic or geopolitical factors.

2. Reducing risk

We reduce risk in our supply chain by continuing to ensure that our controls framework for suppliers operates effectively.

We have developed our approach to identifying and remediating risks as we deploy market leading tools across our source to pay processes. **In 2023, we increased this to 85% of our global spend, compared to 63% in 2022.** We continue to reduce our total number of suppliers, only working with those that can meet high standards on ethical business conduct, employment practices, human rights, and their approach to diversity and the environment.

In 2023, we reduced our suppliers by a further 14% to circa 6,648 across our global supply chain.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the country of employment and to safeguard employees from any abuse or coercion. **Kantar has a Contingent Worker policy in place for the UK and US.** All contingent workers are managed through approved suppliers with contractual obligations in regard to both human rights and modern slavery.

Tackling and Preventing Modern Slavery

3. Due diligence

We have a rigorous supplier selection process, which focuses on actively de-risking our existing supply chain.

This has been supported by the deployment of the Coupa Source to Pay platform and Coupa Source to Contract modules in 14 markets (including UK&I, North America and certain countries in EMEA and APAC). We have designed metrics to capture the spend under Procurement influence and spend under contract, to ensure that key business partnerships are covered under robust legal and commercial frameworks.

We promote the use of supplier contracts which have been negotiated or approved by our Procurement and Legal functions. This is determined by a Supplier Compliance List which is available to the business and embedded in our systems and Procurement policy as part of our guided buying process. This enables us to have high standards and consistency across our approach and processes.

We include a “right to audit” clause in our standard Master Agreement for Suppliers, to ensure we have appropriate flexibility to audit our supplier base where required or where risks persist.

As part of our commitment to acting ethically, we actively refine our policies and procedures to ensure that we act in compliance and with respect for human rights. This includes the active support of our Procurement team on Kantar’s Inclusion and Diversity programme to identify and support Small and Diverse suppliers. In 2023, this enabled us to award \$111m of contracts to 369 diverse and small suppliers in UK and Ireland and North American, and to reach 10% of diverse spend in Coupa managed markets, tracking positively against Kantar’s 2025 target of 12% diverse spend.

Although these programmes have their own benefits, we think of them as just one part of an effort to work closely with our clients, and suppliers, which through industry partnerships allow us to promote our values and to raise awareness about human rights and modern slavery too.

To mitigate risk in our supply chain we have a rigorous onboarding process. All new suppliers set up to support our UK, Ireland and North American business units undergo a comprehensive supplier onboarding process managed by a dedicated team, which includes not only financial due diligence but also compliance checks including modern slavery, anti-bribery and corruption, sanctions screening, cyber and data security checks. Where appropriate we also use external rating agencies such as Dun & Bradstreet and implement risk mitigation plans with suppliers flagged up as potentially high risk.

In 2023 we launched an additional supplier health check scorecard dashboard to further strengthen our due diligence and visibility of supply chain risks. All identified risks are reviewed and managed by our procurement management team throughout the year.

Kantar has taken steps to reduce the risk identified in the data collection element of our business. We have global standards incorporating screening and fair pay obligations. For our data collection suppliers, as well as the rigorous onboarding process described above, we have further assessments to ensure they meet our global standards and are contractually committed to them.

Our Governance

Overall accountability for the Modern Slavery Statement and risk assessment process is held by the Kantar Board and Executive sponsors Michael Uzielli (Chief Financial Officer & Director) and Andy Doyle (Group Chief People Officer).

The Statement is reviewed and supported by representatives of Operations, Procurement, Compliance, Legal, Internal Audit and HR. This subset of stakeholders will continue to convene and develop the Human Rights and Modern Slavery approach for compliance across the business. Updates are provided to Kantar leadership via the Risk, Opportunities and Controls Committee before being approved by the entity boards of those Kantar subsidiaries in scope of the Act.

We measured the success and performance of responsible sourcing activities by tracking Key Performance Indicators (KPIs) and metrics, including spend under Procurement Influence and Spend with Diverse Suppliers.

We have confidence in our approach, and we were awarded a higher silver accreditation in 2023 by Ecovadis. Our ESG framework is advancing to maturity encouraged by our investment in, and increased management responsibility for, the framework.

The ESG Committee defines the ESG strategy and objectives, which covers all relevant ESG matters applicable to Kantar, including ensuring no modern slavery in our supply chain, focusing on diversity, equity and inclusion for all stakeholders, health and wellbeing and learning and development for employees.

More broadly, the Kantar Group has established a governance model comprising the following committees which exercise governance and risk oversight over the business and escalate to the Board of Managers as appropriate.

The **Executive Leadership Team** comprises global senior business leaders from across the organisation who support the Chief Executive in managing the business responsibly, focusing on the overall day-to-day management of the Group, ensuring risks are appropriately managed, leading organisational purpose and culture and driving the successful execution of the strategic objectives. It meets at least ten times annually.

The **Risk, Opportunities and Controls Committee** meets quarterly ahead of, but in sequence with, the Audit Committee and assists the Board and the Audit Committee in fulfilling their responsibilities by:

- **Overseeing the effectiveness of governance, risk management and compliance activity within the Kantar Group**
- **Assessing Principal Risks, reviewing the Risk Management Framework and systems and its overall effectiveness**
- **Analysing and addressing risks, internal control deficiencies and non-compliance**

The **Audit Committee** meets quarterly and is comprised of two members of the Board, one investor director, one WPP Plc director, and an Independent Chair. The Audit Committee has oversight of Risk and Sustainability reporting, which it receives from the Risk, Opportunities and Controls and the ESG Committees.

Our Policies

We have Group-wide policies in place that are relevant to modern slavery, all of which are signed off at Executive Leadership Team level, these include those set out here. We continually review and develop our policies with input from in-house experts, suppliers and external stakeholders.

Kantar Business Principles

Sets minimum commitments for our business conduct. The minimum expectations and responsibilities ensure we act in line with relevant laws and regulations, industry standards and stakeholder expectations. The code applies to everyone at Kantar, including our Board, our management team and all our colleagues, as well as those working in any joint ventures that we control and overseas sourcing offices.

Supplier Code of Conduct

Kantar's Supplier code of conduct was released in 2021 and is scheduled to be reviewed again in 2024. It is issued to all new suppliers onboarded into our finance systems, as well as all forming part of all existing supplier contract renewals. These principles set out our minimum requirements and expectations of how our suppliers and partners conduct business to uphold human rights, labour, environmental, ethical and legal requirements in their own operations and their supply chains.

Human Rights Statement

States our commitment to respecting internationally recognised human rights in line with the principles and guidance contained in the United Nations (UN) Guiding Principles on Business and Human Rights.

Right to Speak

Aimed principally at our colleagues, but also available to anyone working with or for Kantar, our confidential reporting (whistleblowing) channels are managed by Navex where concerns can be raised by phone or online in multiple languages in confidence and anonymously.

Recruitment

Outlines the principles and process for the recruitment and selection process. This Policy aims to ensure that recruitment standards are consistent, appropriate, and free from discrimination or bias.

Procurement Policy

Sets out the essential minimum commitments for sourcing and contractual arrangements with suppliers, including our approvals framework, Kantar contractual terms and use of preferred and approved suppliers. The policy includes supplier decommissioning where suppliers are identified to not adhere to any of Kantar's compliance policy areas. The policy identifies the Procurement function commitments to manage risk, conduct activity with integrity and support Supplier Diversity.

Employee Health & Safety

Globally aims to provide the highest level of health and safety measures and wellbeing practices which in some cases might exceed local requirements as we value all our colleagues, customers and suppliers regardless of where they are located in the world.

Our Training

Our colleagues and our supplier partners play a major role in helping us to identify and prevent modern slavery in our supply chain.

All Kantar colleagues, including new joiners, are required to undertake Mandatory Compliance Training. This training includes an Ethics e-learning module, incorporating protecting and promoting human rights. Topics covered include diversity, modern slavery, human rights, conflicts of interest and avoiding misleading work. The modern slavery module helps our colleagues to consider who the people across our network and stakeholders are and to understand how the choices they make on a daily basis can impact the people who work in our supply chains.

The training was reviewed in 2023 as part of our ongoing commitment to always getting better. As a result of the review, we took a different approach to the training, rolling it out sequentially instead of simultaneously. Ethics was moved to the latter stages of the rollout and will be available to colleagues in January 2024.

In 2024 we will undertake a cross-functional review of the training to enhance the learning experience and maximise engagement, understanding and compliance.



Our Statement, Progress and Commitments

Our commitment to building an ethical culture is reinforced by the principles set out in Kantar's Business Principles (KBPs).

The KBPs were updated in 2023 as part of our ongoing review process to ensure we are always getting better and in line with regulatory and compliance changes. Our KBPs strengthen how we will behave towards each other, reinforced by our Inclusion & Diversity policy. This is important, as it shapes how we show up and how our clients, suppliers and the communities with whom we partner, experience us.

KBP commitments include:

**Respecting each other:
Zero tolerance of bullying or harassment of any kind within our own business or from those we work with no exceptions and no excuses.**

In acting ethically, respecting human rights, upholding workplace conditions and helping to protect our planet, we always try to do the right thing.

In developing our ESG strategy we set ourselves two overarching ambitions: to use data as a lever for positive change, and to help our people and our clients create transformational good for the planet, people and the economy. We aim to make a positive, long-term contribution to the communities where we live and work and use our expertise to have a positive network effect with our clients. This includes actively encouraging the prevention of modern slavery.

Our Statement, Progress and Commitments

How we did against our 2023 commitments:

EcoVadis Accreditation: Kantar increased its Ecovadis score achieving a higher silver score of 67/100 and with a 10% increase in Labour and Human Rights, Ethics and Sustainable Procurement.

UN Global Compact: We completed the 'Commitment to Progress' by sharing our 2022 ESG report. This commits Kantar to meeting fundamental responsibilities in four areas: human rights, labour, environment and anti-corruption.

We published the updated **Right to Speak policy** on our external facing websites in multiple languages.

Supplier management system: the EU deployment of Coupa was successfully completed in 2023. We now have end to end Coupa Source to Pay platform in 9 markets covering 74% of spend (UK, Ireland, US, Canada, Italy, France, Denmark, Spain and Netherlands). As well as the Coupa Source to Contract modules in 5 other markets within MEA and APAC.



Our Statement, Progress and Commitments

Modern Slavery Statement

Through the course of 2023, we have not identified or been made aware of any form of Modern Slavery in any part of our supply chain or within our business

Our Statement, Progress and Commitments

Next steps and commitments for 2024

Our Group risk assessment process has always included an assessment of our compliance with laws and regulations in this area. We continue to update our risk evaluations as our framework matures and as conditions change. Specific plans for 2024 are outlined in the table.

Ongoing commitment	2024 planned activity
Supplier management	We will relaunch our Supplier Code of Conduct in 2024 to take into account renewed ESG criteria related to Scope 3 carbon reduction and responsible use of Artificial Intelligence, and we aim to commit 10% of our annual spend with diversely owned suppliers
Supplier management	In 2024 we aim to risk assess 85% of global third party spend via our Coupa S2P platform.
Sustainability	Kantar is aiming to achieve a Gold Ecovadis rating no later than 2025
Ethics Training including Modern Slavery	<ul style="list-style-type: none"> - All Kantar employees will be required to complete our Ethics mandatory training module to equip them with the knowledge and tools to identify and respond to any reports or suspicion of modern slavery in any of business activities. Our target for completion in 2024 is 85% - We will undertake a detailed review of the Modern Slavery module to ensure its effectiveness
Human Resources	In 2024 we will further embed our interview transcriptions using Microsoft Co-pilot, allowing us to review and ensure consistency and fairness in candidate evaluation
Right to Speak	We will further raise awareness of the Right to Speak platform internally for all markets
Reporting	We will continue to enhance our Corporate Governance section on our website



KANTAR

This 2023 statement was approved by The Kantar Group Limited board on 24 July 2024 and subsequently by each of the subsidiary boards identified within scope above.

Michael Uzielli

Chief Financial Officer and Director

The Kantar Group Limited

24 July 2024