

Dentsu Aegis Network Ltd.
Modern Slavery Act 2015 (Act) - Statement

Introduction

Dentsu Aegis Network Ltd. (DAN) specialises in providing media, digital and creative communications services. DAN is a wholly-owned subsidiary of Dentsu Inc. of Japan and is headquartered in London, with a presence in over 145 countries. DAN has a comprehensive set of internal global policies that encapsulate the obligations under the Act to prohibit modern slavery and human trafficking within DAN's business and its supply chain.

DAN is committed to conducting business with integrity and to the highest ethical standards, respecting human rights and protecting the interests of both DAN employees and society. DAN has a zero tolerance of modern slavery and human trafficking and is committed to ensuring no form of modern slavery or human trafficking exists within its supply chain. DAN expects the same from everyone it does business with and will not knowingly engage with any person or organisation suspected of being involved in modern slavery or human trafficking in any form.

Supply chain

As a media, digital and creative communications services provider, DAN procures services across a diverse range of goods and services. Suppliers include but are not limited to:

- Media owners (including online, TV, print and other media);
- IT services and equipment providers;
- Printing and production suppliers;
- Photographic and other media and creative services suppliers;
- Facilities management and office suppliers;
- Catering suppliers; and
- Travel services suppliers.

Compliance with our policies

DAN has a number of policies that ensure compliance with the Act. A summary of DAN's key policies and principles have been collated in our Global Business Principles document. This document is available from our website and has been developed for all our stakeholders, including suppliers, to ensure they are familiar with our key principles and policies, including those pertaining to the Act.

DAN's senior management have the overall responsibility for DAN's compliance with the Act. Through the involvement of DAN's key corporate functions such as Procurement, Social Impact, Legal, Finance, Ethics & Compliance and Human Resources, our policies are continuously reviewed and will be adjusted if necessary to ensure risks pertaining to the Act are effectively mitigated. These teams will also keep under review all relevant business activities and practices to ensure continued compliance with the Act as well as communicate the responsibilities to the relevant stakeholders.

Steps taken by DAN to comply with the Act:

Supplier due diligence

DAN has conducted a global risk assessment on its supplier base and has concluded the likelihood of modern slavery in its own business to be very small due to the highly trained and skilled workforce requirements of the media, digital and creative industry and the majority of DAN's suppliers have a similarly skilled workforce and likewise do not operate in high risk industries.

Nevertheless, there is a possibility that some of DAN's 2nd tier suppliers may have some risk of modern slavery in their supply chain. These could include the sourcing to our suppliers of agricultural and fisheries produce for catering purposes, sourcing textiles for promotional purposes, sourcing minerals for use in the manufacture of electronics, or sourcing labour for cleaning, gardening, maintenance or construction purposes.

To ensure that DAN only engages with those suppliers who share and are fully aligned with its values and principles, DAN has partnered with *an independent ethical supplier due diligence platform*.

As part of the updated DAN supplier onboarding process, both existing and prospective suppliers which meet our higher risk threshold will be required to annually certify their compliance in relation to the requirements of the Act through this independent platform's supplier questionnaire. The risk threshold for annual certification will be determined by supply value, geographic origin and nature of the supply.

Supplier adherence to the Act

DAN's standard supplier agreement templates include modern slavery and human trafficking warranties and undertakings. Pursuant to these terms, DAN makes it incumbent upon its suppliers to respect and comply with all applicable laws, including the Act, and DAN reserves the right to terminate its commercial partnership with any supplier who is found to be in breach of, or who fails to comply with the Act.

Management assurance

DAN asks all of its local and regional CEOs and CFOs to annually certify that they understand our policies, abide by them and that they have taken all necessary steps to mitigate the risk of modern slavery in their business.

Reviewing & Monitoring

As part of DAN's ongoing efforts to ensure there is no modern slavery or human trafficking in its supply chain, it intends to continue to review and monitor and, where necessary, enhance its systems, policies and procedures, as well as reinforce communications about the Act across the business.

Declaration

This statement is made in accordance with section 54(1) of the Act. This statement has been approved by the Dentsu Aegis Network Ltd Board of Directors and constitutes DAN's modern slavery and human trafficking statement up to the date of publication of this Statement.

Signed by:



Date:

13 December 2018