

Modern Slavery Act Statement

The Company is part of the Interpublic Group (“IPG”). IPG is committed to corporate governance and lawful and ethical behaviour is of paramount importance and critical to its continued success. The IPG Code of Conduct and the IPG Supplier Code of Conduct require all IPG employees to operate with integrity and transparency in all interactions with clients and other partners and places similar obligations upon its suppliers.

IPG is fully supportive of the laws introduced within the United Kingdom through the Modern Slavery Act 2015 to combat slavery, forced or compulsory labour and the trafficking of persons for any purpose (“**Slavery and Human Trafficking**”).

This statement is made in respect of the Company’s financial year ending 31 December 2019 and is made in accordance with Section 54 of the Modern Slavery Act and outlines the steps that IPG takes and intends to take to protect its business against all forms of Slavery and Human Trafficking.

Copies of statements made by the Company in respect of previous financial years are made available on request to the Company Secretary.

Business and Structure

IPG is one of the world’s largest organisations of advertising and marketing services companies. Its ultimate parent company, The Interpublic Group of Companies, Inc., is listed on the New York Stock Exchange.

As a global organisation, IPG’s suppliers worldwide include, without limitation, production and design companies, IT and communications services ,including software and hardware suppliers, property, office cleaning, office supplies and equipment and facilities management services, including energy suppliers, waste management services, couriers, transportation services, such as road transportation, airlines and train companies, merchandise suppliers, and hospitality service suppliers including hotel conference or venue providers, catering suppliers, professional services such as auditors, actuaries, tax advisors, legal advisors, insurers, banks and talent and recruitment agencies.

Relevant Policies

Doing business in an ethical and responsible manner is already enshrined within IPG’s policies and procedures and in particular, those referred to below help to ensure that Slavery and Human Trafficking do not occur within IPG or its supply chains. These policies are available on IPG’s public website www.interpublic.com.

- IPG Code of Conduct
- IPG Supplier Code of Conduct
- Global Sourcing and Procurement and Third Party Supplier Due Diligence Guidelines
- Anti-Corruption Policy
- Sustainability Policy
- Interpublic Alert Line

IPG requires all its suppliers, employees, agents and subcontractors to adhere to the IPG Supplier Code of Conduct while doing business with or on behalf of IPG. The IPG Supplier Code of Conduct specifically requires use of voluntary labour and prohibits slavery, servitude

or the use of forced or compulsory labour and human or labour trafficking and requires all suppliers to comply with applicable laws.

The Interpublic Alert Line, allows employees or other concerned parties (including prospective and current suppliers and clients) to raise concerns about any business conduct without fear of reprisal or retribution.

Compliance is supported by a robust Internal Audit function which regularly conducts audits of all areas of our business and works closely with the internal Legal Department to ensure compliance with all applicable laws and regulations.

Risk Assessment

IPG companies in the United Kingdom have legal obligations under the Modern Slavery Act 2015. In addition, globally the IPG Supplier Code of Conduct requires use of voluntary labour only and prohibits Slavery and Human Trafficking. IPG communicates the policy to relevant management and employees worldwide.

IPG sources its suppliers in a responsible manner under Global Sourcing and Procurement and Third Party Supplier Due Diligence Guidelines and fully expects and requires its suppliers to operate in full compliance with all applicable laws. A failure by a supplier to comply with applicable laws (including as they relate to Slavery and Human Trafficking) would be a justifiable reason for such relationship to be terminated.

Given the nature of our business, IPG does not consider that there is a significant risk of Slavery and Human Trafficking within its supply chain or its own business and no instances of Slavery and Human Trafficking have been identified by IPG.

IPG continues to build upon its robust compliance culture and seeks to maintain its high standards. As part of its ongoing efforts to insure there is no Slavery or Human Trafficking in its supply chain it intends to identify improvements by reviewing its supplier engagement policies, contractual approaches and due diligence processes to continually monitor the risk of Slavery and Human Trafficking.



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Director
Orion Trading EMEA Limited

Dated 24 SEPTEMBER 2020