

## Modern Slavery Statement

Havas is one of the world's largest global communications groups with more than 22,000 employees in over 100 countries. Havas Group has developed a fully integrated model covering all communications activities. The teams of the three business units, Creative, Media and Health & You, work together with agility and in perfect synergy to offer clients tailor-made, meaningful, innovative, and entertainment-oriented solutions that support them in their positive transformation.

In the UK and Ireland, Havas Group is comprised of several agencies ("Havas UKI") across seven offices: London, Manchester, Thames Ditton, Cirencester, Leeds, Maidstone, and Dublin. Havas Village London is Havas UK's headquarters, where over 25 of our agencies operate from.

This document will outline mechanisms in place to identify risks of modern slavery and effectively manage any associated risk and opportunity at the group level (Havas Group) and Havas UKI level.

### 1. Introduction

Havas Group's mission is to make a meaningful difference to the brands, businesses, and people we work with.

Sustainability is an integral part of the Group's strategy and its actions. In 2020, It launched Havas Positive Impact (Impact+), a purpose-driven corporate Social Responsibility strategy structuring its sustainability commitments around three key pillars: environment, people, and meaningful communication. The mission of Impact+ is to encourage its agencies to use the influence of their professions to bring about positive changes in society. Its goal is to involve its customers, talents, and suppliers in a responsible communications approach, and to raise the standards of the profession in terms of rigour and transparency.

We do not tolerate any form of modern slavery or human trafficking in any part of our business. As a member of the United Nations Global Compact, we maintain our commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has a set of global policies and procedures to tackle modern slavery that apply in full to Havas UKI.

### 2. Supply Chains

Our suppliers provide us with products and services that include:

1. IT and telecommunications services
2. Travel services
3. Catering services
4. Facilities management
5. Human resources services
6. Professional services
7. Advertising and marketing services
8. Printing and Production services
9. Media suppliers
10. Creative suppliers

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## 3. Our policies and procedures

The following summarises the policies, practices and controls present within Havas Group and Havas UKI which set out our commitment to comply with The Act and ensure our suppliers and their suppliers have suitable and effective controls in place to ensure compliance.

- Havas Group is planning the rollout of a Responsible Supplier Charter that sets out the foundational principles guiding ethical and sustainable relationships with our suppliers of good and services, and captures the group's ethics, social, and environmental expectations. The principles enshrined in the policy are intended to ensure ethical and sustainable business relationships and reflect the group's commitment to make every effort to prevent and reduce risks and serious violations of ethics, human rights, and environmental principles in its activities and across all value chains.
- Our Havas Group code of ethics sets out the values and principles of Havas. All employees are expected to be guided in their day-to-day work by the values and principles set forth in the group Code of Ethics, irrespective of their profession, level of responsibility or geographical region.
- A whistleblowing system is available to report breaches, including breaches of serious violations of human right and fundamental freedom, the health and safety of individuals and the environment resulting from the activities of the Group or those of its subcontractors and suppliers with whom they have established business relationship. For reporting any misconduct Havas Group has established a safe and confidential channel, which suppliers and Havas employees are able to use without fear of reprisal. This underscores our commitment to maintaining ethical Charter and transparency within our partnerships.
- Our Havas Village London office's Building Services function has developed and implemented a Supplier Sustainability Questionnaire in line with risk-based criteria focusing on social issues, including health and safety, human rights, and the fight against forced labour and child labour. Prior to the contract commencing, our service providers and suppliers are required to complete and return the questionnaire.

## 4. Risk assessment and due diligence

- Compliance with the Responsible Supplier Charter is a prerequisite for Havas' business relationships. The group asks its suppliers to make a formal commitment to apply high standards of ethics themselves and ensure that human rights are protected.
- Our expectations of suppliers are also set out in the Havas Code of Ethics which applies to all our employees.
- Whistleblowing reports are investigated by the Compliance Investigation Unit or the HR Investigation Unit, as appropriate.
- All service providers or suppliers of Building Services are required to complete the Supplier Sustainability Questionnaire, which is part of our Havas Village London

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office's certified ISO 45001 management system. This asks for confirmation that operations are in line with our stated requirements. Regular spot checks of higher risk service providers and suppliers are undertaken by trained personnel who verify the provided sustainability responses through an audit of relevant policies, procedures, certifications and registrations. Where a noncompliance is evidenced, the organisation is informed and asked to take commensurate actions to rectify the issue and provide assurance of effectiveness. If issues persist, further action will be taken including, where applicable, the service provider or supplier contract being discontinued.

## 5. Training

Compliance with vigilance commitments requires training and awareness of all employees. To this end, all employees are required to complete a mandatory online training course, "Duty of Vigilance – Human Rights, Fundamental Freedoms, Health and Safety, Environment"

## 6. Key Performance Indicators (KPIs)

We use the following KPIs to better understand the effectiveness of our approach to managing modern slavery risks:

- Percentage of employees completing the mandatory Havas University "duty of vigilance" course. As of December 2024, 89% of our employees have completed the course.
- Based on the responses and audits of our Supplier Sustainability Questionnaire, 100% of our service providers and suppliers had the appropriate procedures and policies in place regarding modern slavery and human trafficking.

Havas UKI aims to complement this procedure with a central procedure and questionnaire to cover a wider range of our suppliers. Our priority for next year will be to identify areas of our supply chain that are at higher risk of modern slavery and human trafficking and implement a new central procedure to assess these suppliers.

This statement of Havas UKI is made pursuant to section 54(1) of the Modern Slavery Act 2015 and covers all agencies in Havas UKI.

**Approved by the board of director (or equivalent management body) on the 12<sup>th</sup> of December 2024**

**Signed:**



**Mark Whelan**  
Chairman & UK Group CCO  
Date: 12<sup>th</sup> of December 2024



**Chris Upton**  
CEO, Havas Dublin  
Date: 12<sup>th</sup> of December 2024