



# HUMAN RIGHTS POLICY

At Interpublic Group (IPG), all of our companies take pride in our high ethical standards. We have built this culture by adhering to a set of values centered around respect for every individual and appreciation for universal principles of human rights.

As a company responsible for creating some of the world's most iconic marketing campaigns, we have a special obligation to ensure that the work we do and how we deliver it supports the long-term well-being of our communities.

This Policy serves as a statement of our commitment to the highest ethical standards and fulfillment of our social responsibilities. It applies to all companies in the IPG network around the world, to our employees and to our suppliers.

IPG will take appropriate corrective action (up to and including termination) in the event of any violation of this Policy.

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## GOVERNANCE & OVERSIGHT

Oversight and enforcement of the Human Rights Policy are the responsibility of IPG senior management.

The IPG Board of Directors reviews and considers the implications of social responsibility issues that affect the Company, including human rights. More specifically, the Board's Corporate Governance and Social Responsibility Committee oversees issues of global corporate citizenship and social responsibility, including human rights, and makes recommendations to the full Board regarding the Company's policies and practices on these issues.

Other company policies related to human rights include IPG's [Code of Conduct](#), [Supplier Code of Conduct](#) (SP&P 382), [Sustainability Policy](#) (SP&P 121) and [Anti-Harassment and Equal Opportunity Policy](#) (SP&P 400).

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## COMMITMENT

As a company built on values, IPG continuously implements a purpose-driven strategy. This aligns with our role as a member of the [Business Roundtable](#) and as a signatory to its 2019 [Statement on the Purpose of a Corporation](#), which commits CEOs to lead their companies for the benefit of all stakeholders – customers, employees, suppliers, communities and shareholders.

IPG takes these principles further through various global initiatives. IPG's approach to human rights is guided by international standards and principles including the **United Nations (UN) Guiding Principles on Business and Human Rights; the UN Universal Declaration of Human Rights; the UN International Covenant on Civil and Political Rights; the UN International Covenant on Economic, Social and Cultural Rights; and various International Labour Organization (ILO) conventions.**

Additionally, in October 2015, IPG became a participant in the **UN Global Compact**. IPG is committed to the Compact's Ten Principles on human rights, labor, environment, and anti-corruption, and we agree to uphold these principles. The initiative encourages companies to align strategies and operations with these universal principles, and to report annually on the actions the company takes to advance these societal goals. IPG completes this reporting on an annual basis. IPG has also adopted the **UN Global Compact's Women's Empowerment Principles (WEPs)**.

IPG also engages in work that supports the **UN Sustainable Development Goals (SDGs)**. These 17 global goals are part of the 2030 Agenda for Sustainable Development, which is grounded in international human rights law and advances various aspects of human rights for all people around the world.

Guided by the human rights principles and frameworks mentioned above, IPG makes specific commitments in the following areas:

**Modern slavery and forced labor:** IPG strictly commits to using voluntary labor only. The use of forced labor, whether in the form of indentured labor, bonded labor, prison labor or any other behavior constituting modern slavery or servitude, is prohibited. Engaging in human trafficking is prohibited in any part of our business or supply chain. Workers should not be required to lodge "deposits" or their identity papers with their employer, and they are free to leave their employer after reasonable notice without penalty.

*IPG respects the relevant principles of the ILO's Forced Labour Convention and its 2014 Protocol on the effective and sustained suppression of forced or compulsory labor (P029).*

**Child labor:** To ensure we do not use any form of child labor, IPG strictly complies with all local minimum working age laws and requirements, and requires that employees shall not be younger than 16 years of age, even where allowed by law. We support the development of legitimate workplace apprenticeship programs for the educational benefits of younger people, but we will not do business with those who abuse such systems.

*IPG respects the relevant ILO conventions and principles on Minimum Age (C138) and Worst Forms of Child Labour (C182).*

**Providing fair and humane working conditions:** IPG is committed to labor practices that ensure respectful and ethical treatment of workers and promote conditions through which workers can earn fair wages in safe and healthy workplaces with humane conditions. Employees and suppliers must comply with the relevant laws where they operate.

**Preventing cruel, inhuman, or degrading treatment and harassment:** To promote a safe workplace, we must never tolerate or engage in any form of violence. "Violence" includes threats or acts of violence, intimidation or attempts to instill fear in others. Physical, verbal or psychological abuse or discipline and the threat of physical abuse, sexual, other harassment and forms of intimidation are prohibited.

**Ensuring health and safety:** We are committed to providing high standards of safety and protection for workers. All entities providing work on behalf of IPG must fully comply with all applicable laws, regulations, practices and procedures designed to promote workplace health safety and report unsafe working conditions immediately. Adequate steps shall be taken to minimize the causes of hazards inherent in the working environment.

**Working hours and overtime:** IPG does not require employees to work more than the maximum hours of daily labor set by applicable local laws or policy. Overtime work is compensated in accordance with local laws and regulations. Additionally, IPG's Supplier Code of Conduct prohibits suppliers from requiring workers to work more than the maximum hours of daily labor set by local laws, and it requires suppliers to ensure that overtime is paid in accordance with local laws and regulations.

*IPG respects the relevant principles of the ILO's Hours of Work Convention (C030).*

**Providing a fair and living wage:** All employees shall be provided with clear, written information about their wages before they enter employment and as needed throughout their employment. IPG does not permit deductions from wages as a disciplinary measure, nor deductions from wages not provided for by applicable

law, without the worker's express permission. Wages and benefits paid for a standard working week must meet or exceed applicable legal standards.

**Equal pay:** IPG is committed to compensating employees fairly based on their job, skills and experience, and without regard to protected characteristics. IPG monitors compensation to ensure pay equity across our network and to correct any discrepancies we identify.

*IPG respects the ILO conventions and principles on discrimination (C111) and equal pay (C100).*

**Diversity and non-discrimination:** It is the policy of IPG to promote a fair, ethical and respectful work environment. IPG implements this policy by committing to:

- Provide equal employment opportunities to all employees and applicants for employment, without regard to race, color, religion, creed, national origin, gender, sexual orientation, age, gender identity, marital status, citizenship, disability, genetic information, veteran status, or any other basis prohibited by applicable law.
- Provide reasonable accommodation to applicants and employees with known disabilities whenever possible.
- Promote qualified employees from within the organization whenever possible.
- Ensure that no employee be subject to physical, verbal, or psychological abuse by their supervisors, fellow employees, or non-employees.
- Ensure that no employee be subject to prohibited harassment, including sexual harassment.

For more information on IPG's commitment to non-discrimination, see our [Anti-Harassment and Equal Opportunity Policy](#) (SP&P 400).

IPG ties additional corporate diversity objectives to the compensation of our senior leadership to help ensure accountability and continual progress.

The IPG Board of Directors has made a [formal commitment](#) to having a Board that reflects diverse perspectives, including those based on gender, ethnicity, skills, experience at policy-making levels in areas that are relevant to the Company's global activities, and functional, geographic or cultural background. The Board and its Corporate Governance and Social

Responsibility Committee are committed to actively seeking out women and ethnically diverse director candidates and consider the foregoing factors, among others, in the context of the current composition of the Board and needs of the Company when identifying and evaluating director candidates. IPG's Board Diversity Policy is contained in IPG's [Corporate Governance Guidelines](#).

Through a range of partnerships, IPG advances [diversity, equity and inclusion](#) through [pro bono work](#) and creative initiatives.

**Right to organize:** IPG is a participant in the UN Global Compact and supports its Ten Principles, including that business should uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Community involvement:** IPG strongly encourages its employees to become actively involved in our communities. However, we must be careful to never pressure or coerce others to contribute to or otherwise participate in any charitable organization.

We aim to advance a wide range of human rights issues through community involvement by IPG and our employees, as well as our work with clients. Our community work includes protecting the human rights of women, LGBTQ+ people, those with disabilities, people with mental illness, and marginalized groups around the world. We are committed to responding constructively whenever serious human rights threats emerge where IPG employees live, work and vote.

**Right to vote:** IPG encourages voter participation and opposes any form of voter suppression. IPG is a consistent defender of the right to vote through our membership in the **Civic Alliance**, which supports participatory democracy. We have signed onto the Alliance's "100 Percent In for Democracy Pledge." IPG has also joined **Time to Vote**, a nonpartisan coalition of businesses working to contribute to the culture shift needed to increase voter participation.

**Right to water:** IPG recognizes access to clean water and sanitation as a fundamental human right. Clean water also brings other positive outcomes, including progress in education, income and health, especially for women and girls. That is why IPG is committed

to supporting the United Nations' Sustainable Development Goal (SDG) #6: Access to water and sanitation for all. As part of this commitment, IPG has partnered with **charity: water** on several initiatives that bring water to those in need. Over the years, IPG has launched campaigns to raise money for clean water and has funded water projects in Bangladesh, Cambodia, Ethiopia, Mali and Mozambique.

**Business ethics and anti-corruption:** IPG is committed to ethical business practices and has a zero-tolerance policy with respect to bribery and corruption in any form. We define acceptable behavior in IPG's Code of Conduct and Anti-Corruption Policy (SP&P 309), as well as our Supplier Code of Conduct (S&P 382). Please review these policies in their entirety [here](#).

**Freedom of expression:** IPG respects the right to freedom of expression, which is vital to IPG's pursuit of purpose-driven creativity. We celebrate our employees' differences and their individuality, but we do not tolerate conduct or speech that is contrary to IPG's policies or values.

*Freedom of expression is a fundamental human right, enshrined in Article 19 of the Universal Declaration of Human Rights, in addition to international and regional treaties, and national laws and constitutions (ex: U.S. Constitution, U.K. Human Rights Act Article 10).*

**Responsibility for content:** As a marketing company, IPG recognizes our impacts on the world around us. IPG aims to use our cultural power to magnify and multiply our efforts to ignite progress toward a healthier society that nurtures all people and our planet. IPG strives to ensure that the media channels we use to reach people do not result in or contribute to harm. IPG plays a leading role in the **Unstereotype Alliance**, which is working to eliminate harmful gender-based stereotypes in media and advertising.

**Right to privacy:** IPG respects an individual's right to privacy, which is essential to the free development of an individual's identity, and necessary in democratic societies. We are committed to protecting the personal information of our employees, our clients and their customers.

*The right to privacy is enshrined in the Universal*

*Declaration of Human Rights, the International Covenant on Civil and Political Rights, almost every major international and regional human rights instrument, and the constitutions of nearly every country in the world.*

Today's rapidly evolving technology landscape provides greater capabilities to manage the human rights risks and opportunities linked to data, technology and digital offerings. We respect international human rights obligations regarding the right to privacy when collecting, using, processing, sharing and storing data.

IPG's approach to data privacy is guided by our commitment to data ethics, the cornerstone of responsibility in the digital age. We strive to ensure that data and digital technology are used across the enterprise and with IPG clients in ways that build trust and serve all people.

IPG maintains policies and operational procedures to promote effective privacy protection and comply with existing regulations in this area, such as the General Data Protection Regulation (GDPR) in the European Union and the California Consumer Privacy Act (CCPA). See more detail on our expectations, policies, and procedures in the [IPG Code of Conduct](#) and the IPG **Website Privacy Notice**.

**Intellectual property rights:** IPG respects the invaluable role of intellectual property rights in supporting innovation and creativity. We are proud of the work product we create, including the intellectual property contained in such work product.

IPG is committed to a culture of respecting intellectual property rights owned by others and acquiring them in a lawful, equitable and ethical manner. IPG employees are expected to act in accordance with IPG values with respect to the use of a third party's intellectual property.

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## EMPLOYEE TRAINING & AWARENESS

IPG understands the importance of training, particularly as it relates to ensuring a workplace that operates ethically and protects human rights for every individual. Consistent with this commitment, we require all of our employees to take a Code of Conduct training course annually, and to certify their agreement with the Code and disclose any potential conflicts as part of that process. IPG is redesigning its new-hire training program in 2021 and plans to include topics on human rights, as well as this Policy, in these updated trainings globally.

Additionally, IPG provides anti-harassment training to all new hires in the United States (U.S.) and on an annual basis thereafter. IPG's CEO invites and encourages all employees to take these courses and we have maintained high levels of employee participation.

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## GRIEVANCE REPORTING

IPG seeks to engage employees, suppliers, consultants, freelancers and other business partners who share our values and human rights standards, and who uphold this commitment in the work they do for IPG.

If you believe that any of these entities are not meeting these standards, you are strongly encouraged to report the situation. There will be no retaliation against anyone who, in good faith, complains of or opposes unlawful human rights violations, or who participates in any investigation.

Report any suspected human rights violations immediately. In accordance with IPG policy and local laws, you may make a report by contacting our Alertline at 1-800-828-0896 (if you are located in the U.S.) or report concerns through the Alertline portal, [found here](#). The Alertline is a third-party, independently operated hotline available 24/7 in more than 40 languages.

You may make your report anonymously if you choose, and where allowed by local law. Please remember that reporting anonymously may limit IPG's ability to investigate your concerns.

All reports will be investigated promptly and thoroughly, and appropriate corrective or disciplinary action will be applied whenever necessary. If requested, you will be expected to participate in an investigation of a report. You may receive follow-up information about the outcome of such an investigation.

For more details on how to report alleged violations related specifically to Harassment and Discrimination, see IPG's [Anti-Harassment and Equal Opportunity Policy](#) (SP&P 400).

For more details on IPG's grievance and reporting mechanisms and its Non-Retaliation Policy, see IPG's [Code of Conduct](#).