



Interpublic Supplier Code of Conduct

Interpublic Group of Companies
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The Interpublic Group of Companies, including its subsidiaries (collectively, “IPG,” the “Company” or “us”) is a purpose-driven company, committed to achieving the highest standards in environmental, social and governance (ESG) practices. As a leading global provider of marketing solutions, IPG recognizes the impact that our business activities can have on the world around us, and we are committed to operating our business with the highest standards of integrity and with sustainable practices. IPG seeks to engage suppliers and business partners who share our values and standards, and who uphold this commitment in the work they do for IPG.

This Supplier Code of Conduct communicates our expectations related to legal and regulatory compliance with all the applicable laws and regulations of the supplier’s respective country, including laws and regulations governing anti-corruption, antitrust, data protection, environmental protection, data protection, customer privacy and human rights laws prohibiting slavery, forced labor and human trafficking.

All marketing communications and services should be prepared in compliance with local customs and laws regulating these activities, and should be accurate and transparent communications. IPG will take appropriate corrective action in the event of any violation of this Code.

Scope

IPG expects its suppliers to share the value of conducting business in a responsible fashion. This Code covers all companies in the IPG network around the world, and applies to all suppliers, including their employees, agents and subcontractors.

By “supplier” we mean any company, organization or individual that provides a product or service to IPG or indirectly to any of its clients.

Legal & Regulatory Compliance Practices

All IPG suppliers and their representatives shall conduct their business activities in full compliance with the applicable laws and regulations of their respective countries while conducting business with and/or on behalf of the Company and not take actions (on behalf of IPG) that would cause IPG to be in violation of any applicable laws. In addition to any specific obligations under the supplier’s agreement with the Company, all suppliers shall, without limitation:

- Comply with the anti-corruption laws of the countries in which they do business, including the United States Foreign Corrupt Practices Act and the UK Anti-Bribery Act, and not make any illegal direct or indirect payments or promises of payments to government officials or any other person for the purpose of inducing the individual to misuse their position to obtain or retain business.
- Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharges, including the manufacture, transportation, storage, disposal and release to the environment of such materials.

- Comply with all applicable laws prohibiting slavery, servitude or the use of forced or compulsory labor and human or labor trafficking.
- Be honest, direct and truthful in discussions with regulatory agency representatives and government officials.
- Comply with all applicable data protection laws, regulations, ordinances, other government standards and industry best practices relating to the data protection, privacy, confidentiality, integrity, availability or security of IPG data.
- Comply with applicable tax laws and not request any IPG employee to assist with, or be complicit in, the evasion of tax.
- Comply with all applicable laws relating to anti-money laundering and anti-terrorism.

Business Practices

IPG suppliers and their representatives shall conduct their business interactions and activities with integrity and in accordance with their obligations under their specific agreements with the Company. In addition to those obligations, all of our suppliers shall, without limitation:

- Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy.
- Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.
- Protect and responsibly use both the physical and intellectual assets of IPG, including its property, data and equipment, when authorized by the Company to use such assets.
- Accommodate IPG Third Party Risk Management (TPRM) assessments, as necessary.

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- Use IPG-provided information technology and systems (including email) only for authorized Company business-related purposes. IPG strictly prohibits suppliers and their representatives from using Company-provided technology and systems to create, access, store, print, solicit or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate and/or send any false, derogatory or malicious communications using Company-provided information assets and systems.
- Comply with the intellectual property ownership rights of IPG and others, including but not limited to copyrights, patents, trademarks and trade secrets. Use software, hardware and content only in accordance with their associated licenses or terms of use.
- Speak to the press on IPG's behalf only if the supplier and/or representative is expressly authorized in writing to do so by one of IPG's communications professionals.
- Use good judgment, discretion and moderation when offering gifts or entertainment to IPG employees. In doing so, the supplier and or its representatives will refrain from giving Company employees an individual gift or a combination of gifts, or providing any entertainment that would violate the IPG Code of Conduct. In any event, no supplier may ever offer a bribe, kickback, bartering arrangement for goods or services and/or any other incentive to a Company employee in order to obtain or retain IPG business.
- Avoid the appearance of or actual improprieties or conflicts of interest. Suppliers or their representatives shall not deal directly with any IPG employee whose spouse, domestic partner or other family member or relative holds a significant financial interest in the supplier. Dealing directly in the course of negotiating the supplier agreement or performing the supplier's obligations with a spouse, domestic partner or other family member or relative who is employed by IPG is also prohibited.
- Avoid insider trading by buying or selling IPG stock when in possession of information about IPG that is not available to the investing public and that could influence an investor's decision to buy or sell stock.
- Maintain insurance and provide evidence of such insurance, as requested, with the policies and at the levels required by the Company.
- Inform IPG of any changes to the supplier's tax status which may impact IPG or might mean that the supplier is no longer acting in accordance with applicable tax laws.

Privacy, Security & Data Protection

IPG suppliers shall maintain the privacy and security of any and all data or information supplier creates, obtains, accesses, hosts, uses or receives from or on behalf of IPG or its clients, in the course of its performance of services ("IPG data") provided to IPG and its clients. In addition to any specific obligations under the supplier's agreement with the Company, all suppliers shall, without limitation:

- Not disclose or transfer IPG data to any third party without IPG's express prior written consent.
- Assist IPG in meeting its obligations under data protection or privacy laws, including, but not limited to, notification of individual rights requests received, assistance with responding to such individual rights requests, and assistance with any investigation by any law enforcement body or regulator, including a data protection or similar authority.
- Dispose of IPG data no longer necessary to provide goods or services to IPG.
- Immediately, and within 24 hours, notify IPG of any actual or suspected privacy and/or security incident after becoming aware of the incident, including collaborating in investigation and remediation efforts, unless otherwise stated in the supplier's agreement with the Company.

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- Comply with the requirements set out in IPG’s GDPR Vendor Pack which is maintained on our public Corporate Governance website, as applicable.
- Develop, implement, maintain, monitor, and, where necessary, update a comprehensive written information security program that contains appropriate administrative, technical and physical safeguards to protect IPG data.

Employment Practices

IPG expects its suppliers to share its commitment to human rights and equal opportunity in the workplace. IPG suppliers shall conduct their employment practices in full compliance with all applicable laws and regulations, and shall, without limitation:

- Cooperate with IPG’s commitment to a workforce free of harassment and unlawful discrimination. While we recognize and respect cultural differences, we believe that supplier companies should not engage in discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any other category protected by applicable law.
- Provide a safe and healthy work environment and fully comply with all applicable safety and health laws, regulations and practices. Adequate steps shall be taken to minimize the causes of hazards inherent in the working environment. While on an IPG-owned, IPG-leased or IPG-managed property, suppliers shall comply with all rules and regulations concerning the operation of the property and the interaction with other individuals with access to the property, whether IPG, its clients, or other suppliers, employees or guests.
- Prohibit the use, possession, distribution and sale of illegal drugs while on IPG-owned, IPG-leased or IPG-managed property.
- Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, prison labor, or any other behavior constituting slavery or servitude by a Company supplier or its subcontractors is prohibited and engaging in or the use of human or labor trafficking by a Company supplier or its subcontractors is prohibited.
- Workers should not be required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice without penalty.
- Comply with all local minimum working age laws and requirements and not utilize child labor. Employees shall not be under the legal minimum working age of the respective region or shall not be less than 16 years of age (whichever is higher). We only support the development of legitimate workplace apprenticeship programs for the educational benefit of younger people and will not do business with those who abuse such systems.
- Not engage in physical discipline or abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.
- Pay living wages under humane conditions. All workers shall be provided with clear, written information about their employment conditions with respect to wages before they enter employment and as needed throughout their term of employment. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.
- Not require workers to work more than the maximum hours of daily labor set by local laws; ensure that overtime is paid in accordance with local laws and regulations.
- Keep employee records in accordance with local and national regulations.

Sustainability

IPG is committed to the highest environmental standards and fulfillment of our responsibility on climate action, protecting natural resources, limiting pollution and being transparent about our progress. We believe that our company, employees and suppliers can contribute to a more sustainable world by making informed choices about how we conduct business, produce work and contribute to our communities.

We consider environmental impacts throughout our global activities and planning, and we expect our suppliers and business partners to do the same. IPG requires suppliers to share in our commitment to sustainability and to comply with all applicable environmental laws and regulations. We also encourage suppliers to adopt an environmental sustainability policy.

We further encourage our suppliers, wherever possible, to reduce their total emissions by 30% by 2030 (2019 baseline) and reach net-zero carbon by 2040. We request that suppliers have these targets validated with the Science Based Targets Initiative (SBTi). All suppliers are also requested to disclose their emissions data on an annual basis by responding to the CDP Climate Change questionnaire.

IPG's climate strategy includes a 30% reduction of our Scope 3 emissions by 2030 (2019 baseline). In connection with this target, IPG has launched our supplier engagement program allowing us to better understand, monitor and support reduction of our suppliers' emissions.

Business Diversity Practices

IPG is committed to working with partners that reflect the diversity of our world, our stakeholders, our clients and our clients' customers. IPG considers supplier diversity and sustainability as key components of our strategic sourcing process. To that end, we actively seek out certified diverse business owners who share our commitment to sustainable, equitable operations.

Not only does a diverse supplier base give IPG a competitive advantage, but it helps improve the lives of people around the world, particularly in underrepresented and economically challenged communities. We value our contracts with companies owned by women, racial and ethnic minorities, veterans, LGBTQIA+ people and people with disability.

As a marketing partner for corporate and government clients committed to supplier diversity, IPG and our companies are often contractually obligated to:

1. Provide maximum viable opportunities for Minority (MBE), Women (WBE), Lesbian, Gay, Bisexual and Transgender (LGBT), Service Disabled Veteran-owned Business Enterprises (DV) and Small Business Concerns (SB) to participate with us as suppliers, contractors and subcontractors of goods and services.
2. Measure our expenditures with these qualified vendors.

This information will help our companies and clients identify strategic business alliances through broader supplier participation.

More information about the process and benefits of becoming an IPG-certified diverse supplier can be found [here](#).

Human Rights

IPG's [Human Rights Policy](#) also applies to suppliers and 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. Suppliers are expected to adhere to all other provisions in our Human Rights Policy, including but not limited to fair working conditions, ensuring health and safety, protecting the rights to organize and vote, and providing a fair and living wage.

Supplier Commitment

It is the responsibility of the supplier to ensure that its representatives understand and comply with this Supplier Code of Conduct and IPG's Human Rights Policy, and to inform its IPG contact (or a member of Company management) if any situation develops that causes the supplier to violate this Code or such Policy. IPG suppliers are expected to self-monitor their compliance with this Supplier Code of Conduct. In addition to any other rights IPG may have under its agreement with suppliers, IPG may request the immediate removal of any representative or supplier who behaves in a manner that is unlawful or inconsistent with this Code. IPG retains the rights to audit suppliers at its sole discretion.

To promote compliance with our policies and commitments, we require all our suppliers to certify their agreement with this Code and disclose any potential conflicts as part of that process.

Reporting Concerns

If any of our stakeholders believe that an IPG employee, supplier or other business partner is in violation of this Code or any laws or regulations, they are strongly encouraged to report the situation immediately.

If you wish to report a questionable behavior or possible violation of this Supplier Code of Conduct, IPG has a variety of resources available to assist you. You are encouraged to work with your primary Company contact in resolving a business practice or compliance concern. However, IPG recognizes that there may be times when this is not possible or appropriate. In such instances, IPG operates a confidential [Alertline](#) that allows anonymous reporting, and we have zero tolerance for retaliation against anyone who, in good faith, complains of or opposes unlawful violations, or who participates in any investigation. All reports will be investigated promptly and thoroughly.