

# Human Rights Policy

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## Introduction

Respect for human rights and compliance with relevant law are fundamental principles for mci group, and we do not tolerate any form of modern slavery or human trafficking in any part of our operations. In our business activities, we aim to prevent, identify and address negative impacts on human rights. We look for opportunities to positively promote and support human rights, including children's rights.

Our approach is guided by international standards and principles, including the International Bill of Human Rights, the UN's Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Children's Rights and Business Principles. We are members of the United Nations Global Compact.

## Purpose & scope

This policy statement explains how human rights are relevant to our business and the steps we take to protect human rights. It applies to all mci group agencies and brands. It should be read in conjunction with mci group's Code of Business Conduct, Sustainability Policy and our Guidelines for HR policies and rules.

## What Human Rights issues mean to us

The main ways that human rights are relevant to us are:

### Employees

We respect the human rights of all employees, including permanent, temporary and contract workers. We select and promote our people based on their qualifications and merit, encouraging diversity. We expect all employees to be treated without discrimination or concern for race, religion, national origin, colour, sex, sexual orientation, gender identity or expression, age or disability. We seek to provide safe workplaces. We recognise the rights of our employees to freedom of association and collective bargaining. We will not tolerate harassment or any form of forced compulsory or child labour.

The risk of our direct employees being victims of modern slavery is low.

### Suppliers

Due to our organisational structure, the nature of our business and the wide range of services we offer, we have a complex supply chain ecosystem. On average, we work yearly with an estimated +20,000 suppliers across our various entities.

For our own company operations (direct categories of spend), our suppliers include IT and communication services (incl. software and hardware suppliers), facilities management services and real estate agencies, office cleaning, office supplies and equipment, energy suppliers, travel, and professional and consulting services (auditors, legal advisors, insurers, banks and recruitment agencies).

For our client work (indirect categories of spend), our suppliers typically will include hospitality services (hotels, conference centres, venues, catering and decor suppliers, temp staff agencies, artists and entertainment agencies), waste management services, production, transportation services (airlines, train companies and road transportation, courier services), merchandise suppliers, waste management services, advertising and marketing services.

We expect our suppliers to respect the human rights of their employees and subcontractors and meet human rights standards consistent with mci group's. All suppliers are asked to adhere to mci group's [Supplier Code of Conduct](#) or prove equivalence within their own policies while doing business with or on behalf of mci group. The Supplier Code of Conduct explicitly prohibits any child, forced or illegal labour from manufacturing products or providing services, and they are expected to apply these requirements to their own supply chain.

We continually assess supply chain risk based on country, industry sector, categories of goods and services, and individual suppliers.

We apply due diligence and ensure that any products or services we purchase are not manufactured or provided using child labour when sourcing in risky countries (using the [UNICEF Children's Rights in the Workplace Index](#)).

## Client work

mci group will not undertake work designed to mislead on human rights issues. Where relevant, we will work with our clients on human rights issues and comply with client policies about human rights and marketing.

## Work for human rights organisations

Communications campaigns can be used to raise awareness of human rights issues and to encourage action to protect human rights. Our agencies provide creative services to organisations involved in protecting and promoting human rights, often pro bono (for little or no fee). mci group supports and encourages this involvement.

## Our commitments

To embed our commitment to protect and promote human rights, mci group will:

- Comply with all relevant laws and support international human rights standards.
- Reflect our commitment to human rights in our policies and procedures.
- Ensure that any product or service we purchase does not harm children, does not benefit from child labour or does not allow for human trafficking.
- Take steps to identify, prevent or address human rights impacts. This includes integrating human rights into our risk management processes.
- Provide training for our employees on human rights.
- Operate a grievance mechanism to enable employees and suppliers to report human rights concerns.
- Regularly review and update our approach to human rights.
- Take steps to support and promote human rights, including through our pro bono work.

## Responsibilities

Our Group Sustainability Team has responsibility for overseeing our approach to human rights. Each mci group agency is expected to comply with this policy and implement the procedures needed to meet its requirements. It is the role of mci group - the parent company - to communicate this policy to all agencies and brands that are part of our group, to provide support and guidance for our business leaders and employees on human rights and to integrate human rights considerations into group-level policies and procedures where relevant.

## Reporting a concern and remediation

mci group employees, suppliers and other stakeholders can report any human rights concerns via our [Ethics Line](#). This is managed by a third party and overseen by our Group Ethics Officer.

Our SpeakUp programme is communicated during our Onboarding session with new employees, on our intranet and external websites, in our Code of Business Ethics and via our mandatory ethics training.

Reports received from a whistleblower are handled in accordance with our Whistleblowing guidelines. Each report is logged, investigated and tracked until the conclusion, including any remediation actions that may be required.

## Monitoring our processes and progress

- Continue integrating human rights into our risk management processes.
- Conduct ad hoc audits within our value chain if there is any suspicion of human rights non-compliance is identified.
- Office audits on compliance with our Code of Business Conduct, and relevant local and international laws
- 100% completion of our ethics and human rights onboarding module for all new hires
- Grievance mechanism is in place since 2021 (so far 0 report on human rights issues)
- We report annually on our due diligence obligations ([mci group Annual Company Report](#))

## Related policies (available [here](#))

- Code of Business Conduct
- Supplier Code of Conduct
- Sustainability Policy
- Guidelines HR policies and rules (for internal use only – sharing on demand)

Approved by the Board on 13 March 2025



Signed: Sebastien Tondeur, CEO, mci group

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