

The background consists of several large, overlapping triangles in black and dark grey. A prominent white triangle is in the bottom-left corner. The text is positioned in the upper-left area, set against a black background.

Nielsen and its  
approach to  
**human rights**

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# 2021 Nielsen modern slavery statement for the year ending 31 December 2020

*This Modern Slavery Statement was approved by the Board of Directors, the principal governing body of Nielsen Holdings plc, on April 22, 2021.*

## Our business and organizational structure

Nielsen Holdings plc (NYSE: NLSN) is a leading global data and analytics company that provides a holistic and objective understanding of the media industry. As of December 31, 2020, Nielsen was divided into two business units. Nielsen Global Media provides the media and advertising industries with unbiased and reliable metrics that create a shared understanding of the industry required for markets to function. NielsenIQ (formerly known as Nielsen Global Connect) provides consumer packaged goods manufacturers and retailers with accurate, actionable information and insights and a complete picture of the complex and changing marketplace that companies need to innovate and grow. On March 5, 2021, Nielsen Holdings plc announced that it completed the previously announced sale of NielsenIQ to affiliates of Advent International. An S&P 500 company, Nielsen has operations in nearly 60 countries following the close of the NielsenIQ sale. As a global company with a commitment to integrity and corporate citizenship, we manage and monitor the risks of human and labor rights violations associated with our operations and the suppliers who are core to our business across the globe. This statement constitutes our anti-slavery and human trafficking statement covering all of Nielsen, and

our subsidiaries, for the financial year ending December 31, 2020. It is also aligned with Nielsen's Global Commitment to Human Rights, which was updated in February 2021.

## Our supply chain

Nielsen's supply chain consists of purchases in three high-level categories: technology, services and measuring equipment. About half of our spend is on technology and telecommunications. This category includes suppliers that are large, multinational enterprises based in the U.S. and Europe and, to a lesser degree, small- to medium-sized enterprises (SMEs) in emerging markets. Close to 40% of our spend is with suppliers—which also tend to be large, global companies—for professional services, real estate and travel. The balance of our spend is on marketing research and related services, also primarily with SMEs located in many of the regions where we operate. A relatively small subset of our suppliers are contract manufacturers who manufacture Nielsen-designed electronic measurement devices, which are used to track television viewership, radio listening, etc., with our research panels. These suppliers tend to be small- to medium-sized enterprises primarily producing these devices in Asia. In 2020, the suppliers manufacturing our electronic devices were shut down in Asia beginning in January - March, with intermittent shutdowns throughout the year.

## Risk of human rights issues in our business and supply chain

We recognize that monitoring human rights risks is critical for all stakeholder groups, but that not all groups require the same type or degree of monitoring, resources and support. With that in mind, we have identified key high-risk groups that require more rigorous

monitoring, including manufacturing suppliers, panelists and Nielsen employees—for the latter group, it is particularly important to monitor those who perform their job responsibilities in the field. Nielsen is continually revising our approach to providing these groups and others with the resources and information they need to recognize and address potential human rights risks or opportunities that might come up in the course of their work or interactions with Nielsen.

As it relates to our supply chain, Nielsen understands that electronics manufacturing poses greater risks of human rights and supply chain violations than other sectors, particularly in certain geographies. To address this particular risk, in addition to the required environmental, social and governance (ESG) assessment, Nielsen requires its electronics manufacturing suppliers in high-risk countries to complete specific social compliance questionnaires addressing human rights and fair labor conditions at the production facility level. These self-assessments are required on a regular basis to monitor and evaluate human rights and labor risks within supplier organizations. The results of these questionnaires, along with other supplier due diligence tools and subsequent dialogue, determine the need for social audits to be conducted by a third-party audit firm.

Additionally, for these suppliers, Nielsen uses an online, third-party platform available to members of the **Responsible Business Alliance (RBA)** to assess conformance with the RBA Code Section A.1, which states, among other standards, that: “Forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used.” This risk assessment online platform is used to evaluate specific supplier and factory risks with respect to the RBA Code (including Section A.1) by inherent risk, sector and location.

Nielsen also submits strategic supplier data to Made In A Free World, a nonprofit that

works to eradicate slavery with the help of a community of advocates, doctors, doers and changemakers. The organization’s expertise is to identify slavery and implement resources to care for victims of human trafficking and slavery. Made In A Free World uses a tool, FDRM, to specifically measure the risk of slavery in our full supply chain based on the inputs to various goods and services. We go into greater detail about the steps we have taken as a company to assess and manage that risk in the pages that follow.

## Our policies and practices to protect human rights

Pursuant to the United Kingdom Modern Slavery Act 2015, Part 6, Section 54 and Australia Modern Slavery Act 2018 (Cth), Nielsen Holdings plc and other relevant group companies (Nielsen) have taken steps during the financial year to identify any sources of potential risk of slavery and human trafficking in our supply chain and other parts of our business. Nielsen aligns itself with the recommendations set forth in recognized external standards, including the UN Guiding Principles on Business and Human Rights, built on the UN Universal Declaration of Human Rights; the International Labor Organization (ILO) Conventions; European Convention on Human Rights; and the human rights-related recommendations set forth in the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Nielsen’s alignment with these principles covers human rights risks related to—but not limited to—the following areas: discrimination, harassment, retaliation, excessive or forced labor, child labor, appropriate compensation and minimum living wages aligned with ILO conventions, safe working conditions, and slavery and human trafficking. We demonstrate our commitment to human rights and the fair treatment of workers with policies and practices that prohibit human rights abuses in our organization and our supply chain, particularly with regard to

involuntary labor, human trafficking or unacceptable work conditions, including but not limited to, conditions relating to pay, hours and environment. This commitment is further outlined in our Nielsen Supplier Code of Conduct and Nielsen's Global Commitment to Human Rights.

Nielsen leaders are responsible for ensuring our practices demonstrate a commitment to human rights. Functional responsibility for managing, monitoring and tracking potential human rights impacts and risks of our business and operations is managed across a variety of functions, including: Procurement, Operations, Corporate Audit, Human Resources, Legal & Corporate Affairs, Marketing & Communications, Finance, Corporate Citizenship and Diversity, Equity & Inclusion. Each functional group contributes its unique competencies to ensure that relevant human rights risks are addressed or incorporated into existing policies or practices if and as needed.

One such functional group with responsibility in this area is our Integrity Leader program, which is governed by Compliance & Integrity within Legal & Corporate Affairs. Among other functions, Integrity Leaders are available to all employees to confidentially report any misconduct or concerns related to any aspect of the company, including any issue that may be related to human rights. In the normal course of their work, Compliance and the Integrity Leaders may use information relevant to human rights-related issues to drive awareness throughout the organization and to mitigate risk in this area.

Our Global Security team is committed to ensuring the safety and security of our people in our offices, in the field, or working remotely across nearly 100 countries in which we operated in 2020. Our approach is aligned with the Voluntary Principles for Security and Human Rights, including the use of risk assessments that incorporate a local or regional understanding of potential human rights-related risks alongside any relevant prevention or mitigation actions. The Global Security team liaises with private and public sector entities

as well as with external stakeholder groups to obtain actionable insights about new and evolving political, economic and health risks. Nielsen develops and maintains processes to address potential issues of workplace health and safety for employees.

Oversight of all Citizenship & Sustainability issues resides with our Board of Directors, specifically within the Nomination and Corporate Governance Committee Charter of our Board of Directors. We also manage relevant risks and opportunities through a variety of ongoing internal engagement channels and rely on guidance from leaders across the company. More information about our overall efforts across environmental, social and governance (ESG) areas critical for our business can be found in our Nielsen Global Responsibility Report and our non-financial materiality assessment. We published our third Nielsen Global Responsibility Report in May 2020; this report serves as the comprehensive hub for how our environmental, social and governance performance and strategy connect to our business, with a focus on data from 2018 and 2019. The report contains additional information about our approach to managing human rights-related risks in our operations and through our supply chain.

## **Our due diligence processes to protect human rights across our business**

Human rights is also embedded in our overall approach to Risk Management through our Enterprise Risk Management (ERM) framework. This multichannel collaboration allows us to take a more comprehensive and proactive approach to human rights risk management. ERM ensures that we are conducting regular assessments of our key risk areas, monitoring and reporting on these risks, and integrating any relevant findings into our organizational processes and policies as needed. We also monitor human rights-related

risks on an ongoing basis through a variety of other internal audit processes across geographies and different areas of our business.

## Training available to our staff

As it relates to employee engagement on human rights-related issues, our Nielsen Code of Conduct is separate from our Supplier Code and establishes guidelines and expectations for lawful and ethical conduct by our employees around the world. Our Code of Conduct includes a section on "Protecting Human Rights" to ensure every employee is aware of and understands our obligations and expectations in this area, and encourages employees to be vigilant in protecting against exploitation of vulnerable populations, human trafficking and child and forced labor. The Nielsen Code of Conduct is translated into over 40 languages and all employees are asked to certify regularly that they understand and will comply with the Code of Conduct.\* Nielsen provides virtual, dedicated training for our employees to complement our Global Commitment to Human Rights.

As it relates to training available to our staff who work with our supply chain, through our membership in the RBA, we make online training modules on the Nielsen Supplier Code of Conduct available to both Nielsen employees and suppliers. Training modules in social compliance can be assigned to internal staff and suppliers, and participation is tracked. Our Global Procurement team around the world maintains completed RBA certificate training on the Supplier Code. Nielsen provides further training to those with a direct supplier relationship to ensure they are readily capable of identifying any potential abuses. Three members of the team who work with electronics manufacturers have been trained by the RBA to audit factories against the Supplier Code.

## Our due diligence processes to protect human rights across our supply chain

Nielsen is a supporting member of the **Responsible Business Alliance**, and as such, our Supplier Code of Conduct incorporates key aspects of this industry code. The RBA Supplier Code has been adopted by more than 100 Fortune 500/multinational corporations engaged within the global electronics supply chain. We have chosen to align ourselves with this industry code and organization due to the particular risk of exposure to labor exploitation within the technology and electronics equipment manufacturing segments of our supply chain. We use our best endeavors to ensure all suppliers agree to adhere to our global supplier code or their own equivalent code and to include contractual requirements for legal compliance.

Prior to contracting with a supplier, Nielsen establishes a baseline of expectations regarding social compliance through our Supplier Code of Conduct. We assess the social compliance risk of new suppliers prior to contracting with them and require management systems necessary to address any potential violations after the contract is implemented.

Once a supplier enters our supply chain, Nielsen uses its best endeavors to ensure supplier compliance with our human rights policies through its Global Procurement organization, which provides appropriate oversight through planning, control, monitoring, measurement, corrective action, auditing, review and reporting.

Nielsen regularly collects data on strategic suppliers who are core to our business using third-party supplier self-assessments. The first self-assessment gathers information generally about strategic suppliers' environmental, social and governance (ESG) policies at the company level. It also verifies supplier disclosure with documentation such as written company policies, third-party certifications, and membership or adherence to widely recognized industry standards such as the RBA, along with media and

nongovernmental (NGO) reports. From these data points, a scorecard is generated on ESG risks for our strategic suppliers.

Nielsen completes these risk assessments and verification for our top strategic suppliers annually. Based on these assessments, Nielsen determines mitigating actions and corrective action plans with those suppliers. This assessment process was maintained with our top 100 suppliers located in 26 countries in 5 global regions in 2020.

To address social and human rights risk in our electronics factories, Nielsen regularly collects company- and facility-level data through two specific social compliance questionnaires geared towards electronics manufacturers, along with dialogue and third-party due diligence to assess risks and identify further action, such as the need for social audits. We did not collect this data in 2020, since our factories are primarily located in Asia and were shut down and/or operational only intermittently throughout the year due to COVID-19 related shutdowns.

The Global Procurement team kept apprised of the broad impacts to the global electronics supply chain during 2020 through RBA updates and meetings which included other large global technology companies.

Typically, Nielsen's Global Procurement team engages with contract manufacturers several times a year through regularly scheduled on-site factory visits, conference calls and meetings. Open communication at the company and production facility level was ongoing and pronounced in 2020 with our manufacturing partners, though there were no on-site factory visits due to travel restrictions, and production schedules were challenging and unpredictable due to the pandemic. We anticipate a return to our normal due diligence processes in 2021.

\*Unless prohibited by local law.

\*\*Nielsen Holdings plc is the reporting entity, for the purposes of Australia Modern Slavery Act 2018 (Cth).

## Our effectiveness in protecting human rights across our business and supply chain

We use a variety of performance indicators to measure our progress and performance as it relates to protecting human rights throughout our business, operations and supply chain. As detailed in this document, we actively measure our suppliers' performance and progress across a range of environmental, social and governance (ESG) areas, including human rights-related risks. As it relates to our business, we regularly monitor human rights risks that may be raised through our internal audits, as well as through the functional areas with some form of dedicated responsibility to protecting human rights across our organization.

We are committed to regularly sharing updates with our stakeholders and the general public on our approach to addressing human rights-related risks and opportunities across our business and supply chain, through resources such as our Nielsen Global Responsibility Report and regular communications via our website. This statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act 2015 and Australia Modern Slavery Act 2018 (Cth). It constitutes our anti-slavery and human trafficking statement covering all of Nielsen, and our subsidiaries, for the financial year ending 12/31/20.

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**Signed for and on behalf of Nielsen Holdings plc. \*\***

**Director name:** David Kenny

**Director signature:** 

**Date:** April 22, 2021