

communisis

Modern Slavery Statement

June 2022

17/06/2022

Communis UK Ltd Modern Slavery Statement 2022

The information in this statement, which is signed by Phil Hoggarth our Chief Executive Officer, details the policies, processes and actions Communis UK Ltd has taken to mitigate the risk of modern slavery and human trafficking in our supply chains and any part of our own business. It covers the activities of all businesses in all jurisdictions within the Communis UK Ltd group of companies (Communis) and is our Modern Slavery Statement for the financial year ended 31 December 2021, required under the provisions of the UK Modern Slavery Act 2015 (the “Act”) and in accordance with clause 54.

Article 4 of the European Convention on Human Rights states that No one shall be held in slavery or servitude and No one shall be required to perform forced or compulsory labour. The Modern Slavery Act 2015 (the Act) creates offences relating to holding another person in slavery or servitude and human trafficking (which relates to where a person arranges or facilitates the travel of another person with a view to the transported person being exploited).

Communis will not tolerate the use of slavery, slave labour or servitude in the manufacture of products it sells and will not accept products or services from Suppliers that utilise or condone any such practices in any form. The offences created by the Act, (or similar Modern Slavery and Human Trafficking or equivalent offences), exist in countries throughout the world. This policy sets out how Communis will make efforts to eradicate human trafficking and slavery from not only within its organisation but also from its supply chains.

Communis and all of its subsidiaries seeks to ensure that these principles are pursued across its entire range of business activities and that its suppliers commit to the same level of ethical standards.

This is upheld through the company’s policies and processes and is supported by the Executive Board.

SCOPE

This policy covers all Communis employees, workers, contractors and agents and also the activities of its Suppliers. It also applies to any prospective joint ventures and corporate merger and acquisition activity. In the event anything within this policy conflicts with local law, local law will control the interpretation and application of this policy.

OUR BUSINESS

Communis is a purpose-led print, marketing and creative services business that manufactures and procures products and services for our clients. Our purpose is “Powering brand engagement through outstanding communications, conversations and outcomes that make lives better”. Our clients are based in the UK, the rest of Europe, and North America many with global footprints where we may provide products to. Over 90% of our clients are in the FMCG and Financial Services industries.

Our supply chain is predominately based in Europe, with goods also manufactured in China.

In fulfilling our purpose, Communis is committed to conducting business ethically and responsibly. Within our own operations and those of our suppliers (manufacturers) we utilise a mix of full time and temporary workers. With no workers younger than the legal minimum and within our own operations no one younger than 18 years old.

We also seek to ensure that our supply chains operate to those same high standards, including those in relation to employment practices, workplace conditions and, more specifically, the prevention of forced, bonded and trafficked labour.

We recognise and work closely with worker unions, and we require alignment from our suppliers to our policies related to freedom of association and human rights.

For the purposes of recruitment, we also utilise the services of a recruitment business, and we require them to demonstrate their adherence to our approach to tackling modern slavery as well as sharing their own policies and steps that they take.

Communis is committed to ethical and lawful employment practices and is committed to a work environment that is free from slavery, servitude and human trafficking. It also requires its suppliers, subcontractors, and business partners (together “Suppliers”) to follow such practices worldwide.

Communis and its Suppliers shall:

- Not use forced or compulsory labour (i.e. work or service that a worker provides involuntarily, or under threat of penalty, including forced overtime where such has not been approved by collective bargaining)
- Ensure that the terms of employment or work are voluntary and freely entered into by the worker, and that personal documents such as passports are not withheld
- Ensure that workers are not charged a fee in association with their recruitment and that they are not required to lodge security payments or deposits
- Comply as a minimum with age requirements prescribed by applicable laws
- Remunerate its workers with wages and benefits that meet or exceed the legally required minimum
- Abide by any applicable law concerning maximum hours of work.

OUR POLICIES & APPROACH

Communis shall and its Suppliers will be required to confirm that they comply with the Act including all of the requirements set out above, by agreeing to be bound by Communis’ Modern Slavery & Human Trafficking Code of Conduct (MSHT Code). This will include their commitment to take appropriate steps to ensure that any materials incorporated into the products they provide have been sourced from suppliers who themselves comply with the laws regarding human trafficking and slavery within the country or countries in which they operate.

Our Human Rights Policy is aligned to the UN Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) fundamental conventions on labour rights are at the core of all interactions with people across our entire operation and supply chain. This policy sets out our commitment and how we will work to ensure those human rights are protected in our interactions with each other, our clients and customers, our suppliers and people within those communities and organisations. It also states our support for freedom of association and collective bargaining.

In addition, we have human resources policies that set out our approach to recruitment, pay, hiring and the management and appropriate disciplinary steps the business may take. We have developed new policies that also support a new hybrid way of working that is the result of the Covid-19 pandemic.

All our policies are available to our colleagues via our intranet system and those that relate to their employment are available on their own device through our self-serve HR system.

Our supply chain partner policies and the requirement for adherence to our policies begins with our pre-qualification questionnaire and is managed by our procurement team, with support from relevant stakeholders within the business. The appropriate stakeholders may also be required to assess and check third party supplier policies to ensure that they meet the standards that we set. In the absence of a specific supplier policy, they will be required to adopt our policies whilst they develop their own.

Any non-adherence to policies by Communis colleagues is managed via our internal disciplinary processes. Any supplier non-adherence to policies is set out in our contracts and is managed by our procurement team, and if deemed serious enough we would take the necessary steps to remove that supplier from our supply chain.

All our policies are monitored as part of our risk management framework and amended at regular intervals or when significant events require them to be amended. The ownership of all policies is assigned to the relevant executive leadership team officer and they are required to sign-off those policies.

DUE DILIGENCE

We carry out ongoing due diligence across our own business and our suppliers and is a collaborative process with various functions across Communis. Our risk framework sets out how we approach this, and the internal audit programme supports this also.

To date we have not discovered any instances of modern slavery in our business or our suppliers.

We operate a supplier management process that includes visits to supplier sites, as well as an assessment programme that where appropriate may require EcoVadis assessment, SEDEX and/or SMETA audits. If deemed necessary, we will have those carried out by third party assessors.

The supplier management process is ongoing and our procurement and category management teams ensure that they build relationships with suppliers. We see this as an important means by which we can engage with suppliers, to share and learn from best practice across all subjects.

We have clearly communicated grievance procedures that can be followed by colleagues and suppliers (and their employees) should there be a requirement to do so. There will be no negative consequences for anyone raising genuine concerns and they are all treated with importance. Communisis also provide a confidential whistleblowing channel, independently operated, that can be accessed by colleagues, contractors and other third-party individuals.

RISK ASSESSMENT & MANAGEMENT

The Communisis risk team, supported by the procurement, responsible business and HR teams maintain oversight of business compliance to this policy, and to support any required instances of non-compliance.

Our risk framework governs how we manage risk at Communisis, and risk related to workers and their rights are covered by specific risks on the register. The risk framework is ultimately owned by the Chief Risk Officer at Communisis.

Any identified risk which may be specific to a country, region, sector, relationship (with supplier, contractor, partner), good or service supplied is assessed, added to the register if required and assigned with a risk manager and owner. These risks are regularly reviewed by the owner and our executive leadership team.

The risk assessment process determines the severity, and those risks that are tractable – with mitigation and management appropriate to the size of the risk, the capacity and amount of responsibility that is borne by our business.

Where required any, and all, internal and external stakeholders are made aware of and understand their role in the risk, the management of it and how we are prioritising the risk.

KEY PERFORMANCE INDICATORS (KPIs)

Our primary KPI is the number of instances of modern slavery that have occurred within our business or those within our supply chain.

Material suppliers, and those that we deem critical are required to complete an annual EcoVadis assessment, an independent third-party, that is focused on four themes: Human Rights, Ethics, Sustainability and Responsible Supply Chain practices. The results of the assessments are shared with Communisis and where there are areas of concern, we require further information and corrective actions if necessary. The Human Rights assessment is a key section with regards to modern slavery and if there are policy, training or provision gaps these are investigated further.

Where we believe that a supplier operation is a higher risk, we may also require them to undergo a third-party audit, based on SMETA or SEDEX, checking that there are no areas of concern. If found, those concerns are then escalated and a plan to close is formulated.

Ongoing engagement with our supply partners, raising awareness and understanding of our approach and aims helps with engagement with our partners.

Completion of these assessments is a KPI that we monitor via our responsible business team, engaging with the procurement and category managers where there are gaps.

We are currently reviewing the KPIs that we need to have in place to ensure that we have effective and appropriate KPIs in response to The Act and the steps we need to take.

TRAINING

Training is vital to both spot the signs, and for those in critical related roles such as the procurement teams this is particularly true. In recognising this we have two levels of mandatory training that is provided for Communisis colleagues.

Every colleague is required to complete training that will enable them to:

- Understand what modern slavery & trafficking is
- The UK Modern Slavery Act (2015) and how Communisis is committed to supporting and enforcing the provisions of the Act.
- What to look out for to raise awareness that will help them to spot potential instances of modern slavery and/or exploitation
- Who to report it to – internally and externally
- Additionally, those in key roles undergo enhanced training that goes further and also how to engage with supply chain partners.

We report on the completion rates of these training modules, and they are contain a ‘check for understanding’ element that we also monitor to show the efficacy of the training and the learning outcomes.

This training is delivered online and has been developed by our training delivery partners and contains further guidance from “Unchosen”, the Salvation Army and the NSPCC.

ACCOUNTABILITY & RESPONSIBILITY

The Executive Leadership Team is ultimately responsible for putting in place systems for the promotion of ethical and lawful employment practices internally and throughout the Communisis supply chain.

The Procurement Team is responsible for ensuring that procurement practices fully support business requirements with the insistence on high standards of business integrity from our suppliers. They will also ensure that Approved Modern Slavery and Human Trafficking Suppliers adhere to Communisis’ MSHT Code; this covers matters ranging from corporate and social responsibility to business ethics and labour practices. A reasonable opportunity will be afforded to Suppliers to ensure that any breaches of Communisis’ MSHT Code which they could not reasonably have known about upon diligent investigation are rectified. If Suppliers unreasonably refuse Communisis the facilities to undertake an audit, fail an audit or are found to have engaged in human trafficking and/or slavery they may have their supply agreements terminated on the grounds they have breached that supply agreement.

All employees are required to adhere to the requirements of this policy and exhibit high standards of business integrity avoiding any conduct which may be brought into question. All instances of non-compliance must be reported to the relevant business area and escalated to the Executive Board if deemed necessary.

Communisis’ compliance with this policy shall be monitored through Internal Audit. Suppliers must be able to demonstrate compliance with Communisis’ MSHT Code at the request and to the satisfaction of Communisis, who shall upon reasonable notice, be entitled to undertake periodic audits to ensure compliance with this Policy.

Authorised by:	Phil Hoggarth CEO/President OSG Europe	 7A35DDF2D56D4BD...	June 17, 2022
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