

## MODERN SLAVERY STATEMENT – FY2019

Communis Limited is committed to conducting business responsibly. 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. This is upheld through the company's policies and processes and is supported by the Executive Board.

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Communis Limited and its subsidiaries during year ending 31 December 2019 in this area.

### OUR BUSINESS

Communis is an integrated business services company which drives client value and sustainable profit improvement, through the provision of increasingly digitally enabled solutions for regulated transactional communication and marketing execution.

### OUR MISSION

To drive client value and sustainable profit improvement through the provision of increasingly digitally enabled solutions for regulated transactional communication and marketing execution.

### HOW WE DO IT

Our two divisions - Customer Experience and Brand Deployment work with market leading brands, across the globe.

*Customer Experience* makes Communis the UK market leader for Multi-Channel Customer Communication. We provide a vital service to our clients by talking to their customers. We deliver critical messages at a specified time to a known person in the most efficient format.

*Brand Deployment* drives Communis as a European leader in Marketing Execution Services for brands. Our complete 'below the line' marketing solutions help brands realise their potential.

## OUR SUPPLY CHAINS

Communis' £250m supply chain is enormously diverse. We trade with some of the largest global corporations in the world and also with small owner-managed businesses. We trade with suppliers in the UK, North America, Western Europe, Eastern Europe, Middle East and China. As such this requires a robust approach to risk identification and management for both our own and our Client's protection and also to align with our Corporate Social Responsibility ethos.

With respect to Modern Slavery, risk is identified relative to the characteristics of the spend category e.g. For example: high/low labour content, skilled/unskilled labour, options for low cost country sourcing and associated economic development as well as regulatory compliance around employment controls.

## OUR POLICIES

Communis' Modern Slavery and Human Trafficking policy was launched in November 2015 aligning fully with the Modern Slavery Act 2015 (the "Act"). This policy is owned and monitored at Executive Board level and works alongside existing group policies on Procurement, HR & Recruitment, Whistleblower, Dignity in the Workplace and Code of Ethics to give us a comprehensive control environment in this important area.

Communis has a zero-tolerance approach to forced, bonded or compulsory labour, human trafficking and other kinds of slavery.

## OUR APPROACH

Communis has established processes and procedures that are designed to prevent modern slavery and human trafficking within our own business and within our supply chain. These extend from our Recruitment Policy and process with its associated

vetting requirement, through Induction and annual mandatory training for all colleagues at either awareness or advanced level depending on individual role.

For the management of our supply chain, Communis has developed its supplier due diligence processes to create a toolkit aimed specifically at dealing with modern slavery and its associated issues. Our approach provides for a mix of education, development and enforcement across our supply chains additionally supporting the development of our suppliers where appropriate.

The foundation of our approach is a comprehensive supplier Pre-Qualification Questionnaire, along with support to our Modern Slavery Code of Conduct – in addition to our pre-existing “Supplier Code” - which outlines our expectations with respect to our values.

Supplemental Supplier management activities which help us to assess risk on an ongoing basis are Supplier Audit programmes with ongoing risk assessment around the indicators of slavery. Where necessary further self-assessment and investigation is required, and corrective action taken which may or may not include suspension of trading but will always include an improvement programme.

## EVALUATING OUR PROGRESS

During 2018 we continued to embed the tenets of the protection of the Modern Slavery Act 2015 into our standard policies and practices to ensure that the issues are addressed as business as usual for Communis and its Supply Chain and recorded as such. As part of our approach to continuous improvement we collaborate with external parties including professional institutions and our Client base to share best practice and deliver improvement opportunities as they become apparent and necessary.

We found no instances of modern slavery in our supply chains in 2019 and we remain confident that we are well placed to address any that may be identified in our normal business operation.

Approved by the Communis Limited Board on 16<sup>th</sup> June 2020.

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**ANDY BLUNDELL**

Chief Executive