

# Modern Slavery & Human Trafficking

## Board Statement



## Introduction

Paragon Customer Communications Limited is publishing this statement under the provisions of the UK Modern Slavery Act 2015 (the 'Act'), which requires businesses to state the actions taken throughout the financial year to ensure the risk of Modern Slavery is mitigated in our own business and throughout our supply chains.

Paragon supports the objectives of the Act in eliminating slavery, servitude, forced labour and human trafficking. We are committed to ensuring our practices and procedures, and those of our suppliers, are in line with this. We do not tolerate exploitation.

Paragon supports the Act in raising the awareness of Modern Slavery and Human Trafficking. Paragon presents its Slavery and Human trafficking statement for the financial year ended 30th of June 2018.

Our policy on Anti-Slavery and Human Trafficking applies to all persons working for or on behalf of Paragon in any capacity. This includes but does not limit the policy applicability to employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives, and business partners.

Our comprehensive and expanding programmes have led to the development of an effective system to:

- Identify, assess and mitigate any potential risks within our own operation
- Identify, assess and mitigate any potential risks within our supply chain
- Undertake further due diligence on high-risk supply partners
- Protect whistle-blowers

## Our Business

Paragon Customer Communications (PCC) is the UK's largest producer of direct mail, and delivers a wide range of marketing, transactional and regulatory communications on behalf of some of the country's biggest business.

The company operates as a natural extension of its clients' businesses, sending four million customer communications every day and interacting with every household in the UK on a weekly basis across physical and digital channels. Across 14 UK sites, PCC employs over 1,900 people and manages relationships with more than 3,000 clients.

Our business has again grown significantly through acquisition in 2017/2018, with further ambitious growth targets. We are committed to integrating newly acquired businesses, harmonising processes and ensuring best practices are shared and implemented.

## Policies

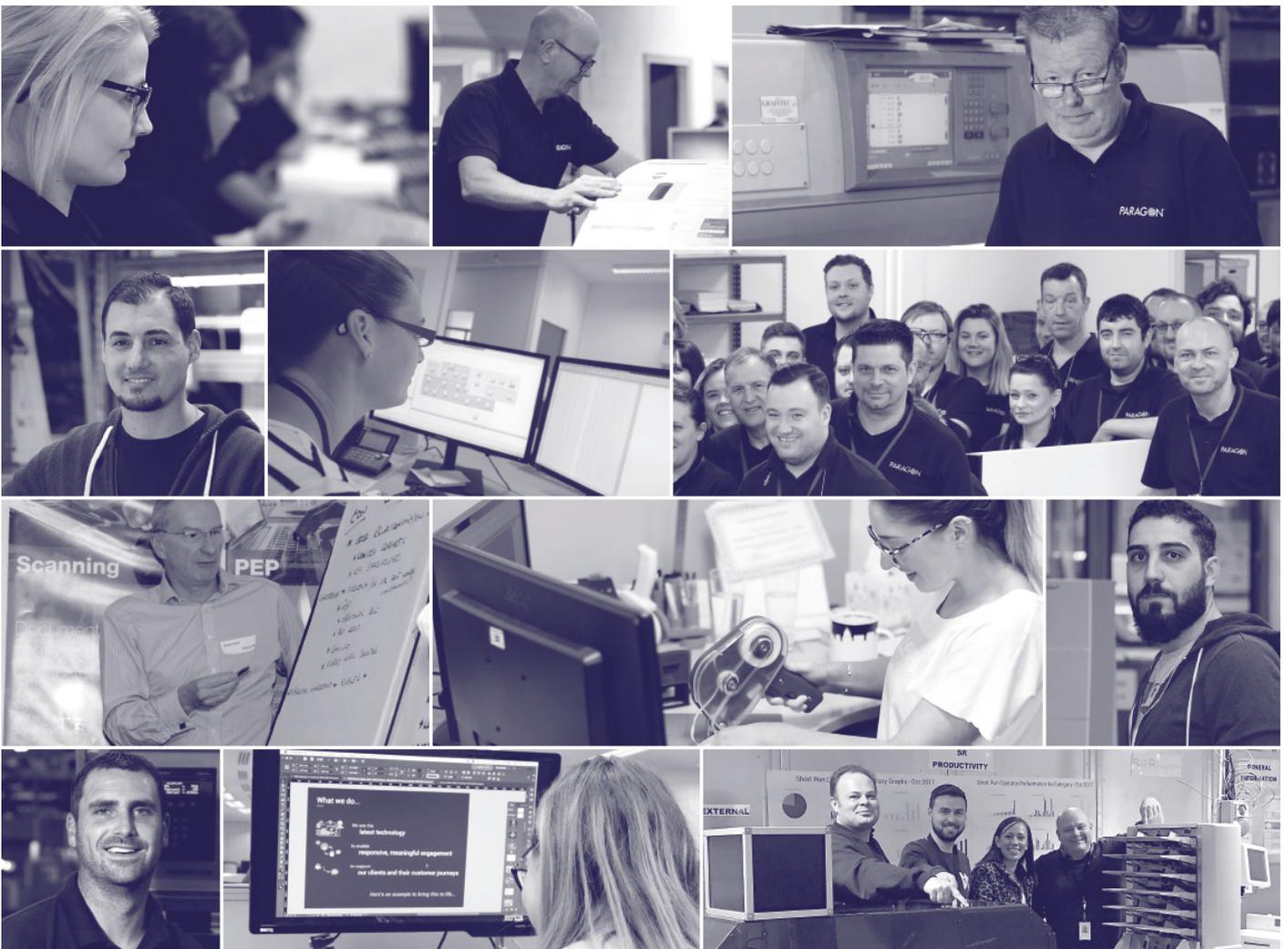
Paragon has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We have enforced effective systems and controls to minimise the risk of Modern Slavery in our own business and supply chains.

Our policies and practices in the UK include:

- Paragon Code of Conduct
- Supplier Code of Conduct
- Recruitment and Selection Policy
- Whistle-Blowing Policy
- Equal Opportunities
- Anti-Bribery and Corruption

## Training

All UK employees are required to read, sign, and comply with our HR and Ethics & Compliance policies, which include the Modern Slavery policy.



## **Due diligence process in our business**

All companies within Paragon Customer Communications Limited have been audited to assess their employment arrangements and Human Resources policies. It has been determined that the risk of any of these offences occurring in this area is low. Paragon utilises temporary employees in addition to our permanent employees to support our business needs. All employees, whether temporary or permanent are paid in accordance with the same guidelines.

Paragon also adheres to the standards of the National Living Wage legislation and Minimum Wage legislation in the UK and relevant local regulation in each market within which we operate. This is reviewed on an annual basis.

We have recruitment processes in place to ensure that where we appoint a third party to assist with recruitment; they do not charge recruitment fees to the individual being considered for employment. We undertake verification of all individuals, as required by UK legislation, prior to appointment and in certain roles, which includes DBS and other security checks.

During the year to 30th June 2018 there were no reported incidents of slavery, servitude, forced or compulsory labour or human trafficking relating to Paragon's employment arrangements recorded through the whistleblowing process, and no issues came to the Company's attention through its other management and HR processes.

## **Due diligence process in our supply chains**

Paragon's diverse range of activities has resulted in a supply chain that ranges from large corporate enterprises to small family run businesses. Paragon expects its contractors, suppliers, and other business partners to uphold high standards in all business practices and to share our zero-tolerance approach to slavery and human trafficking. We expect all suppliers to comply with all relevant laws of the country in which they operate.

As part of the contracting processes, all UK suppliers are required to sign the Paragon Supplier Code of Conduct which includes prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, and anyone held in slavery or servitude.

During this financial year, we implemented methodology to assess the potential risk of modern slavery across our supply chain. Supply partners operating in countries and industries with a high prevalence and / or risk of modern slavery undergo further due diligence to ensure their employment practices are in line with the International Labour Organisations recommendations. Our supplier due diligence is completed annually by a dedicated compliance team.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Paragon's slavery and human trafficking statement for the financial year ended 30th June 2018.

**This statement was approved by the board of Paragon Customer Communications Ltd**

Signed: 

Jeremy Walters, CEO of Paragon Customer Communications

November 2018