

# MODERN SLAVERY & HUMAN TRAFFICKING: Board Statement

**Paragon Group 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.**

The Paragon Group of companies supports the objectives of the Act in eliminating slavery, servitude, forced labour and human trafficking and 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 Group supports the Act in raising the awareness of Modern Slavery and Human Trafficking. Paragon Group 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 Group, 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 Group is a UK registered Group with operations across 15 European countries, a global sales reach and close to 5,000 employees worldwide, operating in three divisions.

- Paragon Customer Communications provides a range of marketing, transactional and regulatory communications services to our clients to improve their inbound and outbound communications with their customers.
- Paragon ID delivers RFID and contactless solutions for personal identification, mass transit, smart cities, brand protection and traceability.
- Paragon Graphic Services is an on-demand digital print network offering design and marketing services to businesses, as well as reprographic services to the engineering, construction and retail sectors.

We operate across 150+ sites including printing, scanning, fulfilment, data analysis and electronic communications.

As 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 across the business.

## Policies

Paragon Group 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

## Due diligence process in our business

All companies within the Group 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 Group 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 Group 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.

In the UK 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 Group's employment arrangements recorded through the whistleblowing process, and no issues came to the Group's attention through its other management and HR processes.

## 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 in our supply chains

Paragon Group's diverse range of activities has resulted in a supply chain that ranges from large corporate enterprises to small family run businesses.

Paragon Group 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.

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

APPROVED BY THE BOARD, on 7th September 2018

Signed:  .....

*Sean Shine, COO of Paragon Group*

**Paragon Group Ltd.**

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