

MODERN SLAVERY & HUMAN TRAFFICKING: Board Statement

Executive Summary

Paragon Group Limited is publishing this statement in accordance with 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 its business and throughout its supply chains.

In this statement references to “Paragon” or the “Company” are references to Paragon Group Limited, and references to “the Group” or to the “Paragon Group” are references to Paragon and its subsidiaries.

This statement applies to the Company and each of its subsidiaries in respect of the financial year ending 30 June 2022.

Paragon is committed to ensuring there is no slavery, servitude, forced or compulsory labour or human trafficking in our supply chains or within any part of our operations; and we enforce effective systems and controls to minimise the risk.

Our policies and practices include our Recruitment and Selection Policy, Equal Opportunities Policy, Supplier Code of Conduct and Whistleblowing Policy. All companies within Paragon are audited to assess their employment arrangements and Human Resources policies, with the risk of any of these offences occurring determined to be low. Supply partners operating in countries or industries with a high risk of modern slavery undergo due diligence to ensure their employment practices are in line with the International Labour Organisations recommendations. Our Anti- Slavery and Human-Trafficking policies apply to all persons working for, or on behalf of the Company in any capacity, including but not limited to, employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives, and business partners.

Our 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

During the financial year ending 30 June 2022 there were no reported incidents of slavery, servitude, forced or compulsory labour or human trafficking relating to the Company’s employment arrangements recorded through the whistleblowing process, and no issues came to the Company’s attention through its management and human resources processes.

Paragon Group's Business, Structure, and Supply Chains

Paragon Group is an international organisation present in over 20 countries with a global sales reach, €1.457 billion turnover and more than 9,000 employees. A leading provider of Customer Communications, Identification, Graphics and Office Services. Paragon Group combines generations of experience with the latest innovations in technology and smart data to enable responsive and meaningful interactions between organisations and their customers.

The Group comprises four Divisions – Paragon Customer Communications (PCC), Paragon Identification (PID), Paragon Graphic Services (PGS) and Paragon Office Services. Each business is organised and runs independently with dedicated leadership teams.

Acquisitive growth, integration, and evolution

Paragon Group acquired a number of companies during the fiscal year:

- Paragon Customer Communications (PCC) completed the acquisitions of DG3's UK operations, Williams Lea CCM Limited, With Reason Limited (Reason) and The Lettershop Group.
- Our Paragon ID (PID) division was highly acquisitive this year acquiring Security Label in Germany, Electronic Data Magnetic (EDM) in the US and Urbanthings in the UK. Post year end, PID also acquired Tracktio in Spain.
- Our packaging business continues to grow following the acquisition of Dean Packaging in April.

We have already substantially integrated the businesses acquired during the fiscal year. The integration and synergies of these businesses will set the Group up for further growth in the future. Our ability to integrate businesses successfully and at scale continues to be a key differentiator and gives us a strong platform for future growth.

The companies in the Paragon Group have assessed their own activities against the list of products at risk of forced labour outlined by the Global Slavery Index 2018. The group does not produce any of these products directly, however a number are sourced in its behalf through its supply chain partners (e.g. textiles and timber (paper) and technology).

Supply Chain

Due to the nature of the services that the Company provides our supply chain is complex. Our vast and diverse network of suppliers stretches globally into Europe, the Middle East, Asia, and the Americas, and consists of small, medium sized enterprise and large-scale corporations with the majority residing in the UK and mainland Europe.

The Company remains committed to acting responsibly and supporting the objectives of the Modern Slavery Act and has established an enhanced strategic approach to vetting current and new suppliers

Paragon expects all 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.

Some likely risk areas for modern slavery within our own supply chains include vulnerable populations in politically or economically unstable countries and high-risk product and service categories, such as clothing and apparel.

As part of the contracting processes, our suppliers are required to:

- Comply with our 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.
- Confirm their approach and supply policies regarding ethical business practice including Modern Slavery, Equal Opportunities and Anti-bribery & Corruption.

Our online supply chain due diligence platform provides a comprehensive framework to identify and mitigate risk. Suppliers must work within the Supplier Code of Conduct regarding fair labour practices, data governance, legislative compliance, environmental and social responsibility, and fair business practices.

Supplier Audit

Beyond the due diligence procedures outlined above, risk-based audits and questionnaires are regularly conducted on our existing strategic supply base. These audits assess a wide variety of issues including:

- Employment policies, practices, and compliance to Working Time Directive
- Subcontracting policies
- Confirmation of right to work as a condition of employment
- Working practices
- Management structures
- Assurance that the sites audited have capacity for types of workloads reported (they are not subcontracted to an unreported 3rd party)
- Any accommodation and transport provided for workers
- Compliance with our Supplier Code of Conduct
- Providing a copy of their own Modern Slavery Statements

These audits are intended to identify any Modern Slavery and Human Rights Abuse practices. We review what appropriate investigative and remedial actions should be taken if issues of concern are identified. The Company is keen to work with our suppliers and respond to any reasonable situations as a responsible company, keeping in mind the best interest of any people that may be affected.

In the event of our procedures highlighting concerns in relation to Modern Slavery and Human Rights abuses among our supplier base, where necessary the Company may terminate the relationship with the supplier in an effort to protect our customers, our employees, our reputation and critically those people potentially at risk of human rights abuses.

Policies

We believe a strong and principled approach to doing business is fundamentally important to our present and future success. Our culture encourages responsible practice at all levels of the organisation and presents clear guiding principles that drive ethical interactions with, and outcomes for, our key stakeholders.

The Company 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.

Control maturity varies across the Paragon Group businesses depending on the risk factors associated with the activities of each company.

Policies and practices may include:

- Staff Handbooks
- Supplier Codes of Conduct
- Employment and Migration Policies
- Recruitment and Selection Policies
- Whistleblowing Policy
- Equal Opportunities Policies
- Anti-Bribery and Corruption Policies
- Human Rights Policy Policies
- Principles of Business Ethics

Employment

Paragon audit and 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.

All our employees receive a written statement of their terms and conditions, including but not limited to; pay, working hours, holiday entitlement and pay, overtime rates, sick pay, and deductions. We carry out checks to ensure that our employees have a legal right to work in the UK or other countries in which they are employed.

We utilise temporary workers in addition to our permanent employees to support our business needs. Any third-party workers are subject to the same checks and policies as our employees. No recruitment fees are paid by the individual being considered for employment.

Paragon also adheres to the standards of the National Living Wage legislation and Minimum Wage legislation in the countries in which we operate. This is reviewed on an annual basis.

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.

Training

We are committed to ensuring that the Company's employees are equipped to understand the implications of the Modern Slavery and Human Rights abuses in our business and to identify risk factors and escalate appropriately.

Key performance indicators (KPIs) for 2022/2023

For the financial year to 30 June 2023 Paragon have committed to the following KPIs and targets:

- Continue to ensure the effectiveness of the due diligence we undertake on our suppliers
 - Review Company policies and practices
 - Deliver Modern Slavery training for all relevant employees
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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Paragon's Modern Slavery and Human Trafficking statement for the financial year ending 30 June 2022.

ON BEHALF OF THE COMPANY, on 22 December 2022



Signed:
Mike Gordon, Group Chief Operating Officer