

Arvato UK

Statement on Slavery and Human Trafficking

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Arvato is a business process outsourcing (BPO) provider with [locations across the globe](#), and is a subsidiary company of the Bertelsmann Group employing over 70,000 employees. Arvato and Bertelsmann's head offices are based in Gütersloh, Germany. In the UK, Arvato is divided into Supply Chain Management (Birmingham), Financial Solutions (Glasgow) and Customer Relationship Management (CRM), with the group's head office located in Slough.

With the UK government implementing the [Modern Slavery Act 2015](#) on 26th March 2015, from October 2015 commercial organisations are required to produce a Slavery and Human Trafficking Statement for each financial year. In this statement they are required to state what steps the company has taken to prevent any element of slavery and human trafficking from taking place in its business and supply chain.

Policies on slavery and human trafficking

Arvato UK is strongly committed to meeting the Bertelsmann [Code of Conduct](#) to ensure that human rights are respected and fair working conditions are provided. A Diversity and Equal Opportunity check takes place at the beginning of a new contract.

All employees are made aware of both the Harassment Policy and Working Hours Policy.

Due diligence

There are a number of practices in place to ensure that slavery or human trafficking is not taking place within our operations:

- All employees have a contract of employment that determines their rights and obligations including their salary, hours of work, their notice period to terminate the contract, and their holiday entitlement;
- All employees are free to hand in their notice at any time;
- All employees are paid at least the national minimum wage;
- Everyone who joins the company has to complete a form that confirms their right to work in the UK;
- All employment is freely chosen;
- Arvato UK adheres to all legislation regarding employment contracts, wages, health and safety, working time, holiday entitlement and rest breaks.

Employee training

Employees are required to comply with the [Code of Conduct](#) and in 2016 Bertelsmann initiated mandatory Code of Conduct training across the business to ensure awareness. At the beginning of the year, employees are set the objective to participate in this e-learning course and all other mandatory courses that are required to enable employees to do their work.

New starters will be briefed on this statement to ensure their awareness.

Supplier agreement

Our supply chains mainly consist of organisations within the UK or Europe, as we do not normally operate outside these countries. Arvato UK endeavours to avoid contracting with suppliers or sub-contractors that are located in geographical areas where slavery and human trafficking are a more prevalent risk. Arvato UK does however recognise that the upstream supply chain may include countries with a higher risk of modern slavery or human trafficking. To counteract this, Arvato UK has put processes in place to ensure suppliers pass on this obligation to their supply chain.

Arvato UK has informed its suppliers of this new legislation and has sought confirmation that these organisations meet their obligations under the Modern Slavery Act 2015 by filling in a declaration as part of the supplier contract.

In addition to this, Bertelsmann has implemented a [Supplier Code of Conduct](#) across the business at the beginning of 2016 which forms part of all Arvato's existing and potential supplier contracts. This means there are obligatory terms and conditions for suppliers in place that include clauses relating to compliance with the Bertelsmann Code of Conduct and Modern Slavery Act.

These additional requirements have been added to Arvato UK's Internal Supplier Review process. This ensures that any new or existing supplier is compliant with the provisions of the Modern Slavery Act and the Bertelsmann Code of Conduct when entering or renewing a contractual relationship with Arvato UK.

If these standards cannot be met, Arvato UK will take reasonable steps to review the relationship and may consider whether to maintain the supplier relationship going forwards if deficiencies cannot be rectified in a reasonable timeframe.

Responsibility

Responsibility for ensuring that this statement reflects true practices lies with Corporate HR, whilst the HR Director is the main Board Director who has responsibility for ensuring that the statement complies with ethical and legal obligations.

This statement will be updated on an annual basis to reaffirm actions have been taken to ensure that slavery and human trafficking is not taking place within our operations or supply chains.

Signed by:

A handwritten signature in black ink, appearing to read 'R. B. W. C.', with a long horizontal flourish extending to the right.

Position: CEO

Date: 27 March 2017

Review Date: 27 March 2018