

Arvato UK

Statement on Slavery and Human Trafficking

2018/19

REGULATION (EU) 2016/679 Arvato CRM UK

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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 which has 117,000 employees.

Arvato and Bertelsmann's head offices are based in Gütersloh, Germany.

In the UK, Arvato is divided into the following business divisions: Supply Chain Management (Birmingham), Financial Solutions (Glasgow) and Customer Relationship Management (CRM), with the group's head office located in Slough.

Arvato CRM comprises of the following group entities:

- Arvato Limited – Company number 03923307
- Arvato Public Sector Services Limited - Company number 06546834
- Arvato Government services Limited – Company number 05429280
- Arvato CRM Limited - Company number 10483064

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. This statement sets out the steps Arvato CRM 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 CRM 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 opportunity.

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, and 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;
- All employees are required to undergo background checks prior to joining Arvato, which includes providing satisfactory evidence of their right to work in the UK;
- All employment is freely chosen;
- Arvato CRM 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 articulate its expectation that good employment practices are followed. At the beginning of the year, employees are required 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 CRM 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 CRM 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 CRM has put processes in place to ensure suppliers pass on this obligation to their supply chain.

Arvato CRM has informed all its suppliers of this new legislation and sought confirmation that these organisations meet their obligations under the Modern Slavery Act 2015 by seeking a declaration from each supplier contract in 2015/16.

In addition, Bertelsmann has implemented a [Supplier Code of Conduct](https://www.bertelsmann.com/media/verantwortung/downloads/englisch/supplier-code-of-conduct-en.pdf) across the business at the beginning of 2016. This means our expectations regarding the treatment and rights of individuals within the supply chain are clearly articulated to our supply base. A copy of the code of conduct is set out here: <https://www.bertelsmann.com/media/verantwortung/downloads/englisch/supplier-code-of-conduct-en.pdf>

Additional requirements have been added to Arvato CRM's internal supplier review process to ensure that, whenever possible any new or existing supplier confirms compliance with the provisions of the Modern Slavery Act.

Arvato CRM refined its approach in 2018 by evaluating its supplier base and identifying those suppliers which potentially pose a higher risk of poor labour practices, potentially due to the nature of the goods or services being provided as well as their geographical locations.

Further investigation was undertaken in respect of those suppliers identified as higher risk to obtain more assurance that their practices are compliant with the Modern Slavery Act 2015. This included checking suppliers' Modern Slavery statements and policies.

Arvato CRM is developing its approach further in 2019 by taking a more detailed look at suppliers who appear to pose higher risk by making enquiries about their labour practices and supply chains.

This activity enables Arvato to produce and maintain a supplier risk map which provides a clearer indication of our supply chain risk.

Responsibility

Responsibility for ensuring that this statement reflects true practices lies with the Commercial and Employment functions and the Commercial 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:



Position: CEO

Date: 23 May 2019

Review Date: 23 May 2020