

Arvato UK

Statement on Slavery and Human Trafficking

2021

REGULATION (EU) 2016/679 Arvato CRM UK

Arvato UK Statement on Slavery and Human Trafficking

Arvato UK is a business process outsourcing (BPO) provider which employs 1,500 people across five UK sites. Arvato is a subsidiary Bertelsmann Group which employs over 117,000 employees with locations across the globe.

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

In the UK, Arvato Customer Relationship Management (CRM) head office is located in Slough.

Arvato CRM comprises of the following group entities:

- Arvato Limited – Company number 03923307
- 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 and the Labour Standards 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.
- Employment contracts are reviewed annually to ensure Arvato is legally compliant.
- All employees are free to hand in their notice at any time.
- All employees are paid at least the national minimum wage; and auto enrolled into the pension scheme within the legal timeframes.
- 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. No original documents are kept by the employer and all documents once checked are returned to the named employee.
- All employees need to provide bank details that have their names on it, we do not pay salary into another person's account not employed by Arvato.
- All employment is freely chosen. Only adults, 16 years and over will be employed. It is our preference that only those 18 years and over be employed, however, we consider 16-18 year olds on a case-by-case basis. The Safeguarding policy and Apprenticeship policies are applicable here and accessible to all employees.
- Arvato CRM adheres to all legislation regarding employment contracts, wages, health and safety, working time, holiday entitlement and rest breaks. No compulsory overtime is applied.
- Workers through agency are only utilised when absolutely necessary, we favour a direct sourcing and vetting model, however, when used, this can only be facilitated by those on our PSL and have undergone sufficient CMS checking.
- All employees undertake an induction session where points of contact and support are signposted. Information to access support and signposting is also available to employees in discreet locations (e.g., clockrooms)
- Arvato operates a Whistleblowing policy and procedure.
- Arvato would support and or implement measures to seek remedy for an employee, if this policy and practices were not adhered to and breaches occurred impacting said employee.

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. Each 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.

In addition, Bertelsmann has in place a [Supplier Code of Conduct](#) across the business, this was introduced 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 current 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 does not partner with or agencies or individuals who apply worker paid recruitment fees or Mini Umbrella Companies.

If suppliers do not confirm compliance, Arvato CRM will take reasonable steps to review the relationship and may consider whether or not it should maintain the supplier relationship.

Since 2019 Arvato CRM took steps to identify those suppliers which potentially pose a higher risk of poor labour practices, perhaps due to the nature of the goods or services being provided. Where it was thought necessary, further investigation was undertaken in respect of those suppliers identified. Steps were taken to obtain more assurance for higher risk suppliers that their practices are compliant with the Modern Slavery Act 2015. This included statement and policy reviews, questionnaires and further meetings with the supplier when appropriate. The results of these supplier assessments have been recorded and are refreshed periodically. This activity has reduced the number of suppliers in the higher risk category from 42 suppliers at the beginning of 2019 to 8 suppliers by November 2020.

Throughout 2021, the Arvato Internal Auditor will audit the 8 remaining higher risk suppliers. The scope will be to review the steps that the supplier is taking to comply with current modern slavery legislation to give assurance to Arvato that the supplier is meeting the required standard.

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:



Position: CEO

Date: 27 July 2021

Review Date: 31 May 2022

Signed:



Title: CFO

Date: 27 July 2021

Review Date: 31 May 2022