

Modern Slavery & Human Trafficking Policy Statement

Introduction

This statement sets out Complete Business Solutions Group Limited's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking either in our own business or our supply chain. This statement relates to actions and activities during the financial year 1 January 2017 to 31 December 2017.

As part of the office and business product supplies industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Complete Business Solutions Group Limited:

Complete Business Solutions Group Ltd. is an independent company providing high quality business solutions and products to the industrial, commercial, public and third sectors, specialising in providing a single trusted source for a broad range of goods and services.

Our supply chain includes manufacturers of Printers, Copiers and Scanners, Business Machines, Office Interiors and Seating, Workspace and Storage Solutions, Stationery and EOS, Print, Business Machinery, Workwear and developers and producers IT and eCommerce Solutions, as well as wholesalers and distributors.

In order to ensure that all persons within our supply chain complies with our values and ethics we have updated our supplier approval and evaluation processes to include questions on policies, approaches and risk management processes. This is sent to all potential new suppliers and has been sent to all existing suppliers, in order to review their arrangements.

The organisation currently operates in the following countries:

- United Kingdom

There are no activities that are considered to be at high risk of slavery or human trafficking. Through the supplier/procurement procedure the company will ensure that all suppliers will also adhere to the Modern Slavery Act 2015.

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Managing Director and Human Resources Manager
- **Risk assessments:** In the next 12 months our Compliance Manager intends to carry out a risk analysis of our supply chains
- **Investigations/due diligence:** The Human Resources Manager and Compliance Manager are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** The Human Resources Manager and Compliance Manager are responsible for ensuring that the awareness of slavery and human trafficking risks are communicated throughout the organisation and through the supply chain

Relevant policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** Each division within Complete Business Solutions Group encourages all its staff, customers and other business partners to report any concerns related to the direct activities, or the supply chain of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for staff to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report any activities associated to slavery and human trafficking by contacting their immediate line manager or the Human Resources manager.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing the company. We strive to maintain the highest standards of employee conduct and ethical behaviour both in our national operations and in the management of our supply chain.
- **Supplier/Procurement Policy** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat their staff with dignity and respect, and act ethically and within the law in their use of labour. We work with our suppliers to ensure that they meet the standards of the code and, where appropriate, improve their employee's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment Policy** We employ people on a permanent contractual basis. When the need for temporary staff arises, we will only use specified, reputable employment agencies to source labour and always verify the practices of any new agency, before accepting workers from that agency.

Due diligence

Complete Business Solutions Group undertakes due diligence when considering taking on new suppliers, and regularly reviews our existing suppliers. Our due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier in accordance with the supply chain selection and approval process;
- conducting supplier audits or assessments through our Compliance Manager which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- If required, take steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans where applicable;
- If required invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

In light of the introduction of the Modern Slavery Act 2015, we have implemented an on-going review of our existing supply chain which will be concluded by the end of the financial year 31st December 2017, to ensure its compliance.

Training

The company requires all staff, including managers to receive awareness training on modern slavery as a module within the organisation's induction, management development and refresher programmes.

The organisation's modern slavery awareness training will cover:

- our business' purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;

- what steps the company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by distributing flyers to staff, putting up posters across our premises and circulating emails to staff.

The flyers, posters and emails explain:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Managing Director's signature:



Leigh Everington
Managing Director

Dated: 1st January 2017

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