

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff members are expected to report concerns and management are expected to act upon them.

### **Organisation's Structure**

We are primarily a provider of office products and services to the commercial sector. Complete Business Solutions Group Limited has its head office in Wakefield, England, and all offices are based in the United Kingdom.

### **Our Business**

Our business is the integrated, nationwide supply of goods and services to organisations from the public, private and charitable sectors.

### **Our Supply Chains**

Our supply chains include the sourcing of raw material principally related to the provision of office supplies and services.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

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### **Due diligence processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk –

- We manage offices and sites with dedicated management teams to ensure optimum control of the work environment;
- We regionalise the geographical scope of our business to ensure optimum supervision of our operating units;
- Where possible we build long standing relationships with local and national suppliers and make clear our expectations of business behaviour;
- With regards to national supply chains, our point of contact is preferably with a UK company and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain;
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Board of Directors and senior managers are responsible for compliance in their respective departments and for their supplier relationships.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

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### **Our Effectiveness in Combating Slavery and Human Trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Compliance audit programme;
- Use of labour monitoring and payroll systems ensuring that the National Minimum Wage is the current remuneration paid;
- Communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.



**Leigh Everington**  
Managing Director

Dated: 4th December 2017