



# CPI GROUP (UK) LIMITED: ANTI-SLAVERY POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

CPI is a leading book manufacturer, and provider of print, fulfilment, mailing and similar products and services to publishers and business in a wide range of market sectors. With our subsidiaries we have approximately 1,000 employees based at sites across the UK, with a combined annual turnover in excess of £100 million per annum.

Our suppliers provide us with paper, ink, board, adhesives, logistics, and energy. The vast majority of our purchases are from countries within the EEA and USA. We do not trade with countries which are the subject of sanctions or embargoes imposed by either the United Nations or the UK government.

Our operating subsidiaries are:

CPI Antony Rowe Ltd, which operates from premises in Chippenham, Melksham, Eastbourne and Bognor.

CPI Books Ltd, which operates from premises in Chatham, Aylesford and Croydon.

CPI William Clowes Ltd, which operates from premises in Beccles.

CPI Fulfilment and Distribution Ltd, which operates from premises in Chatham, Aylesford and Croydon.

CPI Books Ltd and CPI Antony Rowe Ltd are required by the Modern Slavery Act 2015 to publish this statement, although this statement applies to all CPI UK Group companies.

The Group has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in our new contracts we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.



## Responsibility for the policy

The Group Legal Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Procurement team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management and the HR team are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

We welcome comments on this policy and suggestions of ways in which it might be improved. Please contact the Group Legal Director.

## Compliance with the policy

Relevant staff and suppliers must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for or with us or under our control.

Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. As a member of our staff, you must notify your line manager OR a company Director as soon as possible if you believe or suspect that a breach of or conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains, constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in any form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be obtained from HR.



## **Communication & awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with suppliers and other individuals and organisations working on our behalf if they breach this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for CPI Group (UK) Ltd and each of its subsidiaries for the financial year ending 31st March 2022.

J S Evans  
Group Legal Director

September 2021