Modern Slavery Act Annual Statement 2020

Introduction from the Managing Director

The UK Modern Slavery Act 2015 requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. This statement refers to the financial year ending 31st March 2020.

CFH Docmail Ltd 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. We implement and enforce systems and controls to ensure modern slavery is not taking place within our own business or in any of our supply chains.

We are 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 are committed to the continuous improvement of our practices to combat slavery and human trafficking.

Our Organisation Structure

We are a provider of secure communication services in the print, post and on-line sectors. Our ultimate parent company is CFH Investments Limited and our head office is located in the United Kingdom. On the 31st March 2020 we employed 380 staff, all whom were located in the United Kingdom. The annual turnover of the Company for the year ending 31st March 2020 was approximately £54,074,000.

Our Business

CFH Docmail Limited comprises of three manufacturing / fulfilment sites and a technical office. Our facility in Slough is Print for Business Limited, trading as Print.UK.com. All other facilities trade as CFH Docmail Limited. Our business locations are in England and Scotland.

Our Supply Chains

CFH Docmail Limited procures a wide range of services from a diverse supply chain including:

- Raw materials. (paper, ink)
- Utilities.
- Distribution Services (postal, courier, bulk)
- Equipment Supply and Maintenance Services.
- Communications and IT Services.
- Professional 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 chains.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we apply due diligence in our procurement and supplier assessment processes.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier Compliance to our Values and Ethics on Slavery and Human Trafficking

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethics we have in place a rigorous supply chain compliance programme.

This consists of:

- Assignment to Suppliers of ranking status (Premier, Preferred, General).
- Monitoring and assessment of historical performance.
- Validation of credentials including claimed certifications and accreditations.
- Assessment of a Supplier's fitness for purpose including credit worthiness.
- Completion of a formal annual Supplier Assessment process.
- Provision by Suppliers of a record of compliance to the Modern Slavery Act including a copy of their Modern Slavery Policy document.
- Completion of due diligence audits of Suppliers to ensure adequacy and compliance (including desktop and/or on-site assessment).

A compliance team is in place with involvement from the following departments:

- Legal
- Audit and Compliance
- Human Resources
- Procurement

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 our staff as a minimum as part of an induction programme with updates and refresher training provided as a result of changes to legal/regulatory requirements, formal annual supply chain assessments and management systems review.

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:

- Every employee has a formal contract of employment and is paid at least the Real Living Wage as published from time to time by the Living Wage Foundation.
- Employee salaries are benchmarked against current market trends of like industries and qualifications, skills and competencies.
- Annual Formal Supplier Assessment process completed.
- All of our suppliers that are subject to the Modern slavery Act have provided a record of compliance to the Act including a copy of their Modern Slavery Act Policy document.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that here is no slavery or human trafficking in our supply chains we intend to continue to adhere to and review our current policies and processes, to ensure we remain fully aware of any legal/regulatory changes in combating slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CFH Docmail Ltd's slavery and human trafficking statement for the financial year ending 31st March 2020.

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