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**Prinovis**

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**Prinovis UK Ltd  
Statement on  
Slavery and Human  
Trafficking**

# Prinovis UK Ltd Statement on Slavery and Human Trafficking

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure our business as well as our supply chains are free from slavery and human trafficking.

## Introduction

**Prinovis UK Ltd is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure our supply chains are also free from such practices.**

## **Our organisational structure and operations**

Prinovis UK Ltd is a Gravure printing specialist working in the print manufacturing sector, based in Liverpool, Merseyside.

Prinovis group also has production sites in Ahrensburg, Dresden and Nuremberg in Germany. In addition to the corporate headquarters in Gütersloh, Prinovis has an office in Paris. In total there are 2,300 Prinovis employees.

Prinovis is part of the Bertelsmann Printing Group which comprises all of Bertelsmann's printing operations: gravure and offset printing plants in Germany and the UK as well as offset and digital printing facilities in the U.S.

You can click on Company and Profile links on our website for more information.

## **Nature of our supply chains**

Our key supply chains involve a managed service provider for temporary personnel plus print partners, paper mills and ink suppliers for manufacturing purposes mainly from UK and Europe and a small proportion in the US.

## **Policies relating to slavery and human trafficking**

We provide our commitment implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

## **Risk assessment**

We use the Bertelsmann Supplier Code of Conduct guidelines and Assist4 Compliance and Risk Management databases to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking.

## **Supplier agreement**

We endeavour to avoid contracting with suppliers or sub-contractors that are located in geographical areas where slavery and human trafficking are a more prevalent risk. We do however recognise that the upstream supply chain may include countries with a higher risk of modern slavery or human trafficking.

In addition to this, we have issued a copy of the Bertelsmann Supplier Code of Conduct to all our key suppliers and reinforced this for all suppliers by adding a code of conduct clause to the Prinovis supplier conditions of purchase.

These additional requirements have been added to our Internal Supplier Review process. This ensures that any new or existing supplier is compliant with the provisions of the Modern Slavery Act and the Bertelsmann Code of Conduct when entering or renewing a contractual relationship with us.

If these standards cannot be met, we will take reasonable steps to review the relationship and may consider whether to maintain the supplier relationship going forwards if deficiencies cannot be rectified in a reasonable timeframe.

### **Due diligence processes - Internal**

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, their notice period to terminate the contract, and their holiday entitlement;
- All employees are free to hand in their notice at any time;
- All employees are paid at least the national minimum wage;
- Everyone who joins the company has to supply evidence that confirms their right to work in the UK;
- All employment is freely chosen;
- Adhere to all legislation regarding employment contracts, wages, health and safety, working time, holiday entitlement and rest breaks.

### **Staff Training**

Employees are required to comply with the Code of Conduct and are made aware of their responsibilities by way of completing the Bertelsmann initiated mandatory Code of Conduct training. New starters are also briefed on the Code of Conduct statement to ensure their awareness.

For the protection of those who whistle-blow in relation to an issue of modern slavery we give provision within the Code of Conduct guidelines whereby employees or third parties may also contact one of the external ombudspersons appointed by Bertelsmann. This is by way of email [ombuds@discussconcerns.com](mailto:ombuds@discussconcerns.com) or via a toll free number available on <https://www.bertelsmann.com/corporate-responsibility/compliance/speak-up/>

### **Responsibility**

The corporate HR function led by HR Director takes responsibility for ensuring the statement complies with ethical and legal obligations. It is the Board of Directors responsibilities for their own operational and professional areas to ensure standards are maintained and any appropriate action is taken to address any concerns or breach occurring under this statement.

This statement is reviewed 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 chain.

### **SIGNATURE OF MANAGING DIRECTOR**

A handwritten signature in black ink, appearing to read 'Richard Gray', is written over a faint, light-colored circular stamp or watermark.

**RICHARD GRAY**