

## Modern Slavery Statement

The Company (encompassing Opus Trust Communications, Critiqom, Adare SEC, and Kalamazoo Direct) is a provider of multi-channel customer communications with locations in Leicester, Bellshill, Huddersfield and Redditch. Our clients include highly regulated FTSE 100 businesses and Public Sector organisations. We work with some of the most well-known brands in the UK across the utilities, telecoms, retail, financial services and healthcare sectors.

We physically print and post critical communications like bills, statements and payslips and provide digital delivery through online customer portals, email and SMS text messaging. Our solutions are designed to drive end-customer engagement and reduce operating costs for our clients.

### Commitment

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The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK, and in many cases, exceeds those minimums in relation to its employees.

The Company 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. Anti-Slavery, Human Trafficking, Relationships with other Employees, Clients, Partners & Suppliers, Prevention & Detection of Fraud, Whistleblowing and others are all covered under our corporate policies which are reviewed on a regular basis.

### Definitions

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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.

The Company has taken and is continuing to take appropriate measures and implement practices to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, 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 we expect that our suppliers will hold their own suppliers to the same high standards.

The Company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat

- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

## **Our Supply Chain**

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We expect our suppliers to comply and continue to comply with the requirements of the Modern Slavery Act 2015 and we further expect Suppliers to thoroughly investigate their labour practices and those of their direct suppliers to ensure that there is no Forced Labour or Slavery used anywhere in the Supplier's business or by any of the direct suppliers of the Supplier;

All suppliers to Adare SEC go through our due diligence process at the on-boarding stage and may be subject to regular audits and reviews.

## **Our Policies**

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The Company's business policies and practices always support our adherence to the modern slavery legislation and encourage every employee and associated third party to practise and promote ethical and honest business practices.

## **Potential Exposure**

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The Company adheres to the following processes:

- employee background checks on all new employees covering previous employment, previous residence, and DBS Checks.
- a whistleblowing policy and procedure to ensure individuals are able to raise concerns in line with legislation

## **Reporting Concerns**

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The Company has a Director of Risk and Compliance, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action regarding the Company's obligations, in conjunction with the Director of Employee Experience.

## **The Future**

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We are committed to continually improving the way we educate and inform our employees about modern slavery. This is reviewed annually to ensure we continue to maintain and improve our high standards.

This statement has been reviewed and approved by our Board of Directors for the financial year ending March 2023 and will be reviewed on an annual basis.

Signed  
Name                      Tony Strong  
Job Title                 CEO  
Date                        April 2023