



Modern Day Slavery Statement 2018



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INTRODUCTION

“Apogee is Europe’s largest multi-brand provider of managed print services, document and process technology and outsource services”.

We recognise that slavery and human trafficking is a major world concern and we recognise the need to manage our workplace and supply chain in a way that mitigates the risk of slavery and human trafficking taking place.

ORGANISATION’S STRUCTURE & SCOPE

This statement relates to the business and operations of Apogee Group Limited, this includes: Apogee Corporation Limited, Apogee Corporation (Ireland) Limited, BAS-Burosysteme GmbH, KRR GmbH and any of the Apogee brands which include Apogee Digital Document Services, Apogee Managed Services, and Apogee Desktop Services. Unless otherwise stated, all references to “Apogee”, “The Company”, “we” or “our” in this statement shall include all entities of Apogee Group Limited (6445564).

We provide managed print services, document and process technology and outsource services to customers in the United Kingdom, Republic of Ireland, Jersey and Germany. Apogee Group Limited has its head office in Maidstone in the UK; with operational offices across the UK, Republic of Ireland, Jersey and Germany.

OUR SUPPLY CHAIN

Our supply chain includes the sourcing of print and IT hardware, software solutions, consumables and service related items that are principally related to print and IT technologies from both international and local organisations. As the manufacture of such products is worldwide we recognise a high risk of slavery and human trafficking within the sourcing or raw materials, manufacture and distribution of the products that we supply.

OUR WORKPLACE

We have continued to maintain a framework of policies that define the arrangements and responsibilities that are required to identify and mitigate the risk of slavery and human trafficking taking place within not only our supply chain but also our own workplace and the workplaces we visit as part of our day-to-day business. These include but are not limited to: Anti-Slavery, Corporate Responsibility, Integrity, Supplier Selection, Safeguarding and Whistleblowing Policies.

We continue to verify the right to work of all our employees and persons applying to work at Apogee and in doing so, do not provide employment to any person identified as a child. We provide all employees with a written contract of employment, a salary compliant with current minimum wage and living wage legislation, information regarding pay and deductions, a fair holiday entitlement, a freedom of association, a freedom to choose or leave employment, working hours that are compliant with current working time legislation and access to grievance and whistleblowing procedures.

SUPPLIER DUE DILLIGENCE

To identify areas of greatest risk, during the 2017-2018 financial year we completed an evaluation survey of 39 key distributor suppliers. We also introduced the same evaluation survey for all new suppliers.

The objectives of the evaluation survey are to identify the risk of slavery within the supplier organisation and to evaluate their arrangements to identify and react to the risks of slavery within their own supply networks.

While the survey response is non-contractual, of the 39 key distributor suppliers that were included within our evaluation survey, 23 (59%) returned the evaluation survey with some level of completion.

The below is what we asked our distributor suppliers and how they responded.

Do any of the products or services that they supply to Apogee have supply chains within countries that are rated CCC or lower within the 2016 Global Slavery Index?	17%	39%	44%
	YES	NO	Did not respond
As part of employment, do you house or include accommodation as part of salary or earnings paid to your employees?	0%	70%	30%
	YES	NO	Did not respond
What is the salary structure by which the majority of your employees are paid?	57%	13%	30%
	Annual	Hourly	Did not respond
Provide policies, reports or procedures illustrating how they identify the overall risks of slavery and human trafficking in their supply chain?	29%	50%	21%
	Provided	Not Provided	Not in place
Provide policies, reports, procedures or company standards on human trafficking and slavery they have in place for their employees and contractors and what effective sanctions they are able to enforce for non-compliance?	30%	61%	9%
	Provided	Not Provided	Not in place
For distributor suppliers who are also the original equipment manufacturer to provide policies, reports or procedures to certify that all materials incorporated into their final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate?	26%	65%	9%
	Provided	Not Provided	Not in place
Provide policies, reports, procedures or company standards regarding training provided for relevant employees (e.g. management and those in charge of the supply chain) on what slavery and human trafficking is and how to mitigate the risks of incidents of the same within their supply chain?	26%	65%	9%
	Provided	Not Provided	Not in place

SUMMARY EVALUATION

The results of the evaluation survey suggest that worldwide there is a higher risk of slavery and human trafficking within the extended supply chain of the products that we supply and as such, we should adopt appropriate supplier due diligence methodologies to assess OEM suppliers and distributor suppliers differently and according to the context of the risks involved.

Within the UK our evaluation survey of distributor suppliers, suggest a lower risk of slavery and human trafficking within the local distribution operations. However, there is still much work to undertake to attain transparency across the supply chains and that we should work to achieve transparency through mutual alliance and cooperation or through contractual terms relating to conduct, slavery and human trafficking.

EFFECTIVENESS

We use the following metrics to monitor and evaluate the risks and effectiveness of our due diligence and the shared commitments of our suppliers.

	2017 - 2018
Based on our current level of due diligence, the number of known incidents of Human Trafficking, Forced Labour or Harmful Child Labour within the supply chain of Apogee, whether these be directly and openly or indirectly and discreetly notified.	0
Percentage of preferred suppliers without [†] a written public commitment to the principles of the Modern Slavery Act 2015 ("the Act"), regardless of being obligated by the Act.	42%
Number of supplier evaluation surveys that identify organisations within the Apogee supply chain that have extended chains of supply within countries that are rated CCC or lower by The Global Slavery Index 2018.	17%

[†] where Apogee has not been provided with on request or cannot easily locate a written public commitment to the principals of the Modern Slavery Act 2015 within the public domain

NEXT STEPS

Following a review of the effectiveness of the steps we have taken this year to mitigate the risk of slavery in our supply chains for the year 2019-2020 we will:

- ▲ Adopt appropriate supplier due diligence methodologies to assess both OEM suppliers and distributor suppliers differently and according to the context of the risks involved.
- ▲ Evaluate, develop and deliver further internal training regarding the identification and mitigation of the risks of slavery within our own operations and wider supply chain.

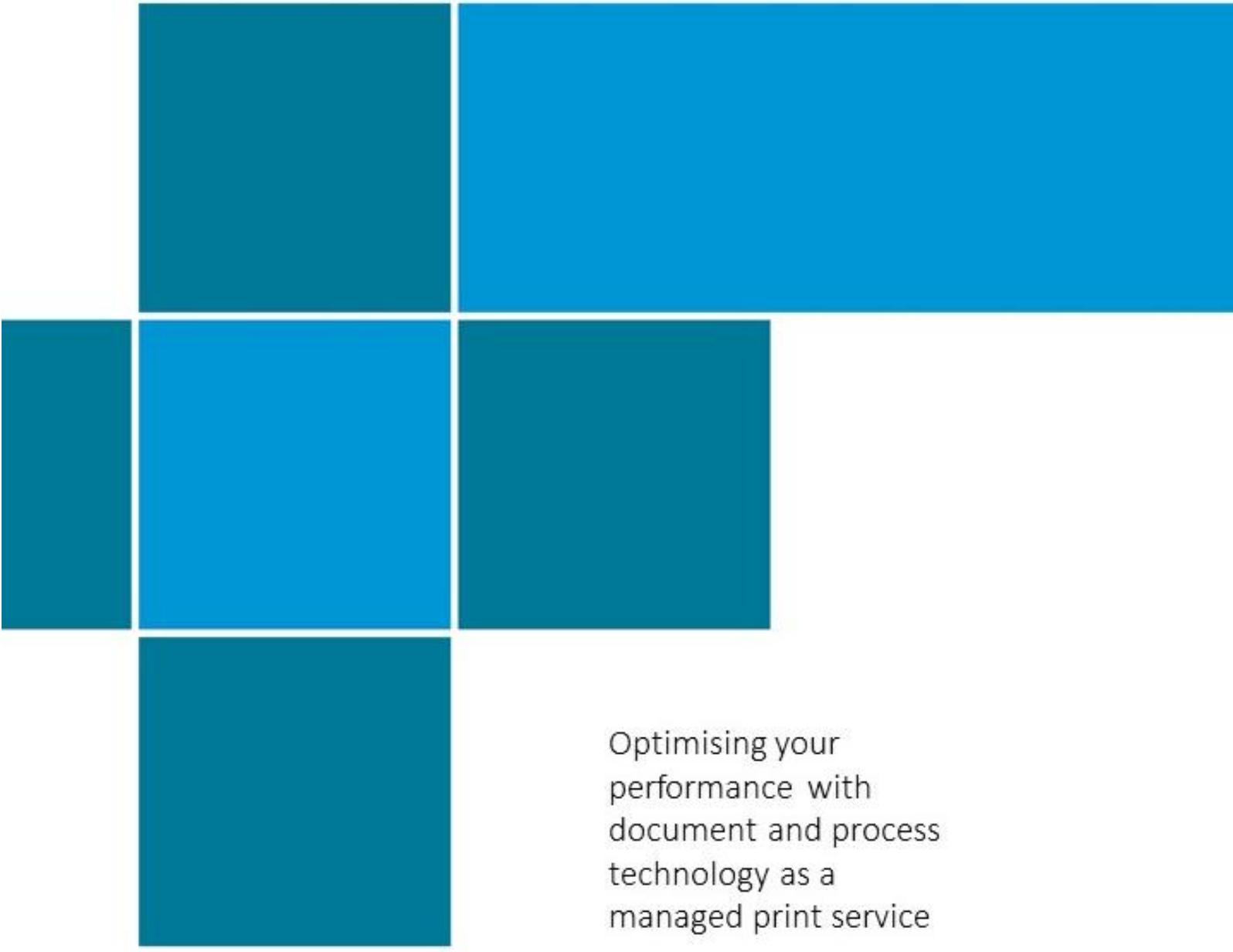
APPROVAL

This statement is made pursuant to Part 6, Section 54 of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the financial year ending 31 October 2018.

Signature : 
 Name : Mark Smyth
 Position : Chief Operating Officer
 Date : 25th March 2019

APOGEE

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performance with
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