

**CPM United Kingdom Ltd**



**2020 Modern Slavery Act Statement**

# PREFACE

By Michelle Tugwell

Chief People Officer of the CPM Group

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CPM United Kingdom Ltd (CPM) has been operating since 1936 and has successfully established itself as Europe's leading sales development agency, with a client base we are incredibly proud of.

Despite the challenging time we've been delivering for our clients and supported them through a very difficult period. We've had to be agile in our approach and their changing needs over the last 12 months.

We encourage our people to adopt a healthy work-life balance and this focus on the wellbeing of our employees has continued to be a key priority during the recent pandemic related challenges the world has experienced.

We've also needed to focus on the health and safety of our employees alongside continuing to service our client's requirements. This has caused considerable disruption with new health and safety protocols being introduced and our teams being furloughed for periods of time.

We continue to value our people and our diversity, recognising the importance of treating others as we would like to be treated. We are open and honest with our people, our clients and our community, ensuring we operate with absolute integrity. We also have mechanisms in place to make sure our clients and employees can give us regular and honest feedback so that we can continuously improve.

Whether we are representing our clients, or ourselves, CPM maintains the highest ethical standards and complies with all legal and regulatory codes at industry, national and international level.

We appreciate we cannot be complacent, and we regularly review our policies and procedures, to identify opportunities to improve. We recognise the importance of publishing this annual statement to highlight our ongoing commitment to ensuring that our business in the UK is operating in accordance with the requirements of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

# ORGANISATION STRUCTURE

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CPM is owned by Omnicom Group – which is an inter-connected global network of leading marketing communications companies. Omnicom’s portfolio provides the best talent, creativity, technology and innovation to some of the world’s most iconic and successful brands. Omnicom offer a diverse, comprehensive range of marketing solutions spanning brand advertising, customer relationship management (CRM), media planning and buying services, public relations and numerous speciality communications services to drive bottom-line results for our clients.

Registered Office: CPM United Kingdom Ltd, Bankside 3, 90-100 Southwark Street, London, SE1 0SW.

CPM’s business model is delivered via a range of core services of sales merchandising, auditing, experiential marketing and customer care programmes.

CPM has a clear and compelling purpose, “to win customers and sell products for our Clients”. We are passionate about growing brands and our Clients’ businesses by delivering Sales face to face, on the phone and via the web.

## OUR COMMITMENT TO HUMAN RIGHTS

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As part of Omnicom Group, we are committed to supporting and respecting internationally proclaimed human rights. This is recognised by Omnicom Group having committed its support to the ten principles of the Global Compact, with respect to human rights, labour, environment and anti-corruption.

CPM therefore ensures that within our sphere of influence, we are always operating ethically and in full compliance with all UK laws applicable to human rights, labour, the environment and anti-corruption. The Omnicom Code of Conduct further underpins this commitment for CPM and all other Omnicom Group companies to ensure that we operate ethically and in accordance with the laws, rules and regulations of the countries in which we operate.

CPM’s commitment to doing business ethically and legally is underpinned by our core values:

- **Freedom** - Always creating an environment where we trust and empower our people to do the right thing.
- **Innovation** - Always thinking of what’s next.
- **Excellence** - Always striving to be the best. Excellence is an attitude, not a skill.
- **Respect** - Always valuing our people and our diversity. Treating others as we would like to be treated.
- **Integrity** - Always being sincere, open and honest with our people, our clients and our community.

Our leadership team have clear written policies and procedures and are fully supported by professional legal advisors to ensure we meet our legal obligations in managing our people.

Our policies and procedures are regularly reviewed to ensure that they are in line with current UK labour laws. Since 1992 CPM has maintained ISO9001 accreditation which sets out a framework from which we have built our management systems, including our policies, objectives, processes, procedures, measures and continuous improvement activities.

CPM's People Hub incorporating our Human Resource, Recruitment, Reward and Talent teams, work closely with our leadership teams to ensure that they are trained to manage our people in line with the 'CPM Way of Managing our People' which ensures consistency of approach and ensures we meet our legal obligations and human rights commitments.

Pre-employment checks are undertaken to ensure that before offering employment we have first established the prospective employee's legal right to work in the UK. We have a zero tolerance for any CPM employees who knowingly violate any UK laws, and the circumstances of any case will be looked at individually.

CPM encourages a free and open culture in dealings between its managers, employees and all people with whom it engages in business and legal relations. CPM recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisation's success ensured. Our 'Whistleblowing Policy' ensures that all employees have a clear avenue open to them to raise concerns that are in the public interest, without fear of reprisal. Similarly, our 'Grievance Procedure' offers CPM employees, a clear route to raise any issues of concern in relation to their employment with CPM.

The focus on Health, Safety and Well-being of our employees has been paramount during 2020. Risk assessments are always undertaken and regularly reviewed to ensure that the working environment for all employees is kept as safe as possible. This ensures that no employees are being put into a working environment which has any hazards that are considered unacceptably managed.

During 2020 we instigated the following precautions:

Full review of Health & Safety measures & training rolled out for office-based employees including:

- In House track & trace processes
- Booking in / out desk process to adhere to social distancing and temperature checking on arrival on site
- One-way systems around site and "No Touch" entry / exit access
- Review of cleaning protocols and provision of PPE

For our field colleagues a full risk assessment was carried out in relation to Covid 19 and additional measures put in place including:

- Including review & provision of appropriate PPE
- Sanitisation and social distancing guidance
- A Full H&S briefing provided to each colleague

We also kept a tight log of any suspected and confirmed Covid 19 cases reported weekly to allow us to keep up to date on the business and colleague impact of COVID 19.

Alongside the health and safety implications of 2020, in the last year we have furloughed and unfurloughed 90% of our employees multiple times, which has created significant disruption to the business as well as to our colleagues personally. Naturally the uncertainty that this generated was very impactful on the individuals affected. For the vast majority of 2020, the focus therefore was around maintaining regular dialogue with our furloughed employees and ensuring their wellbeing.

In particular, the Mental Health of our colleagues was a major concern and we have invested significantly in this area. During 2020 we trained 14 employees as Mental Health First Aiders (MHFA) and introduced the new Wellbeing Portal. It is now very easy for our employees to find in one place all the information and initiatives that are available to support their wellbeing at work. Furthermore, the MHFA's meet monthly as a committee to ensure that mental health remains high on the agenda within our business and employees receive regular communications reminding them of all the support that is available to them.

## **CPM SUPPLY CHAIN**

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Our clients are all well established businesses in the UK, with internationally recognised brands that we represent. All the businesses that we work for are similarly established and regulated as we are to ensure that they would not be intentionally or unintentionally involved in modern slavery or human trafficking.

CPM is involved in a multi-million-pound supply chain and as such we regularly buy goods and services every year. Over the last couple of years, we have engaged with approximately 1,800 suppliers. Of these suppliers about 92% are based or have a presence in the UK. The rest are based or have a presence in the European Union (EU) and North America, with less than 1% being outside the EU or North America.

The top three categories of CPM procurement spend (accounting for more than 75%) comprise:

- Fleet Management – which is outsourced and managed by Lex Autolease
- Travel and Accommodation – which is managed by Inntel
- IT and telecom equipment – which is managed by Omni-ISG

Lex Autolease, Inntel and Omni-ISG have all been carefully selected, giving CPM absolute confidence that they operate their business to the same ethical standards that CPM operates. To enhance our supply chain resilience during 2020, we recruited a dedicated Fleet Manager.

## **OUR UK DUE DILIGENCE AND MONITORING PROCESSES**

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We are confident that the CPM business does not directly fall foul of the Modern Slavery Act 2015. Our internal systems ensure that the employees we engage are never being paid less than the National Minimum wage and operate in line with the Working Time Regulations. We can equally be confident that every employee has the right to work in the UK and is working for our company at their own will.

We have strengthened our due diligence when engaging with new supply chains, to provide a pool of validated suppliers, contractors and vendors who meet the specifics of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Last year when compiling this statement, we identified opportunities to strengthen our processes when engaging new CPM suppliers in the UK. Our focus has been on even greater rigor in reviewing prospective supplier's compliance in this area, with greater weighting being given to selecting suppliers who show a higher commitment to the prevention of slavery and human trafficking. We have commenced our review of our Procurement and Supplier Control Policy to ensure that our business in the UK is operating in accordance with the requirements of section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

## **CPM COMMUNICATION & TRAINING ON SLAVERY AND HUMAN TRAFFICKING**

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The awareness of our commitment to Modern Slavery is highlighted in our communications and our plans for future training are communicated using the same platform. We have added our 2019 Modern Slavery Statement to our People Portal for all our Head Office employees to view.

This year, we have also asked all our Head office and Field employees to complete a mandatory training module, which covers Anti Bribery and Corruption. This has supported the awareness of this important topic for all our colleagues.

We have initiated a project to streamline the buyers within our business. As part of this initiative we will be issuing training out to all newly designated buyers, to understand the nature of modern slavery and human trafficking risks.

All new suppliers and vendors, with an annual turnover of +£36 million must provide evidence of their adherence to the Modern Slavery Act 2015, before we can engage in business with them.

## PROGRESS OVER THE LAST YEAR

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Review of our policies and procedures:

- We have made progress with drafting our Procurement and Supplier Control Policy.
- All new supplier and vendors, with an annual turnover of +£36 million must provide evidence of their adherence to the Modern Slavery Act 2015.
- We have had a much-needed focus on employee safety, mental health and well-being during 2020. We will continue this focus with the new protocols and mental health network we have now set up on an on-going basis.
- We have published our modern slavery statement on our new on-line People Portal for head office employees to view.
- Our Fleet Manager has identified Alphabet as an additional fleet supplier. During 2020 the focus is ensuring that our vehicles are economic, robust and suited for purpose. Against this requirement, we are prioritising the environmental burdens of our fleet, actively moving across to eco-friendly fleet vehicles. In the coming year, the aim is to have a 90% hybrid fleet.
- For our biggest suppliers, we have obtained copies of their Modern Slavery Statements from their corporate websites. Where this has not been possible, we have approached them directly to now provide us with a copy of their statements.

Omnicom have added further mandatory training for all employees, including Ethics and Code of Conduct, Mitigating the risks of facilitating tax evasion; anti-bribery and corruption.

## LOOKING AHEAD

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CPM will continuously look to review its approach and processes to prevent slavery and human trafficking, and to identify further opportunities to improve. We will look to play a proactive role within our supply chain to drive awareness of this subject and to share thoughts on how we can all work together to ensure that slavery and human trafficking does not exist within our supply chain.

One of our key focuses in the coming year is a review of the new supplier set up processes to ensure that the appropriate measures are in place to check compliance with the Modern Slavery Act requirements including, where applicable, a published Modern Slavery Statement. We will continue the review of our Procurement and Supplier Control Policy.

As the People Director for CPM UK, I have responsibility for HR, Training, Recruitment and Reward, alongside ensuring our policies and procedures reflect the type of business we are and our values. We remain focused on Modern Slavery, looking for opportunities to continue improving our awareness in this area.

We will continue with our training programmes to ensure that those involved in our procurement processes remain vigilant in this area. We will ensure that they very clearly understand the nature of slavery and human trafficking risks, and the critical need to assess

and understand what steps prospective suppliers are taking to prevent slavery and human trafficking in their own businesses.

Annually, when we publish CPM's Modern Slavery Act Statement, we will ensure that this is brought to the attention of all CPM employees. We now also have a dedicated team to review our progress against our commitments on a quarterly basis. This will support reinforcing our commitment as a business to preventing slavery and human trafficking and act as a reminder for all employees of the important role they play in making this happen.

CPM will publish its annual Modern Slavery Statement within 6 months of the financial year end which is in December.

The CPM board of directors have approved this statement on 21<sup>st</sup> June 2021.

A handwritten signature in black ink, appearing to read 'CW', is positioned to the left of the signature text.

Signed for and on behalf of CPM United  
Kingdom Ltd

Claire Wicks

People Director, CPM UK

22<sup>nd</sup> June 2021