

CPM United Kingdom Ltd



2023 Modern Slavery Act Statement

PREFACE: Lorraine Butler – CEO, UKI

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. I was appointed as CEO for UKI in January 2022 to lead the collaboration of our newly joined together Irish and UK businesses.

We continue to value our people and our diversity, recognising the importance of treating others as we would like to be treated ourselves. 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.

We encourage our all our people to adopt a healthy work-life balance. Our focus on the wellbeing of our employees has continued to be a key priority post the pandemic as we and our teams now face into the challenges of a cost-of-living crisis.

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

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 create and deliver insight led sales, marketing and customer experience strategies, wherever and whenever our clients' customers and shoppers can be influenced.

OUR COMMITMENT TO HUMAN RIGHTS

As part of Omnicom Group, we are committed to supporting and respecting internationally proclaimed human rights. This is recognised by Omnicom Group having committed to making meaningful impact, focusing on the three CSR priorities to Empower People, Protect Our Planet and Lead Responsibly.

CPM therefore ensures that within our sphere of influence, we endeavour to always operate 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 DNA, which includes three key pillars: we care, we're curious and we achieve together. We ensure through our new starter induction that all new employees are immediately aware of the importance of embracing our values. Through our annual employee survey, the feedback is positive that we live by our values. Furthermore, to reinforce our DNA, our employee award submissions are based around examples that demonstrate employees living by our values.

We strive to ensure CPM remains a place where people can do their best work, and feel they have an opportunity to connect with others and be heard. Central to this are some of our DNA initiatives which seek to understand how we're doing and what can be improved. This includes our 'Your Voice' Sessions which we hold quarterly for our field employees and office based employees, so they can tell us about anything that needs improving and give us feedback on relevant topics such as how we're communicating to how they perceive our benefits offering.

Our leadership team also 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. All employees have access to these policy and procedures which are hosted on Sharepoint.

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.

Our business also has stringent environmental management processes in place and our ROOT committee, remain focused on our sustainability initiatives. We are accredited with ISO 14001.

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.

Starting at the onboarding stage, our people are introduced to our DNA. We have created a behavioural framework to give people clarity on what our DNA means and how we expect people to treat each other and show up every day. It gives us a standard to measure ourselves against and it drives consistency. Included in this framework is the need for us to all be respectful of all beliefs, boundaries and time. We run DNA workshops to help people understand what the DNA is about and how to address when it's not being lived. The DNA is embedded throughout our training, and we support all employees in acquiring the knowledge and awareness to understand how to work with other people internally and externally to achieve the best outcomes for all. We use Insights Discovery to anchor this self-awareness, how to create awareness of others styles and how to adapt own style and approach.

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. We partner with Trust ID to further enhance our rigour in ensuring all employees who work for our business have the legal right to do so. Trust ID are UK government accredited and are approved by CPM compliance and Omnicom (VRA).

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' has been updated in the last year and 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. All line managers are expected to attend the mandatory HR Essentials – Grievance training course, to ensure that are confident and competent in managing any grievances. We are soon launching a new platform for managing performance consistently, this includes monthly 1-1's, Objectives Setting, Annual Reviews and Development Discussions.

CPM complies with the terms of the Health and Safety at Work Act 1974 and subsequent legislation and to provide adequate control of health & safety risks arising from its work activities both in the field and office spaces, The health and safety objective at CPM has always been to protect our employees and minimise the number of instances of occupational accidents and illnesses, Risk assessments and Building compliance form part of the measures that are in place. CPM recognises and accepts their duty to protect the health and safety of all visitors to the company, including contractors and temporary employees, as well as any members of the public who might be affected by our activities. The Health & Safety structure at CPM is always under continuous review, using a Plan, Do, Check, Act system the policies and process are continuously reviewed to ensure the Health & Safety remains at its most effective.

Wellbeing, for us covers the Mental, Physical and Emotional and Financial needs of our colleagues and remains the key focus of our Wellbeing Strategy. Over the course of 2023 we have partnered with Point 3 for Mental Health training for our dedicated Mental Health First Aiders. We have also worked with GroceryAid to run numerous awareness sessions for Managers, Mental Health First Aiders and the Wellbeing Champions on the wealth of resources and support provided. Our managers now have the knowledge and tools to give them the confidence to support any of their team members who may be struggling with any mental health, physical, emotional or financial challenges. We provide our colleagues with access to resources and support for their needs when they need it and plan to launch a new Financial Education platform to the business in 2024. This will provide 1-1 sessions with a Financial Advisor alongside our other resources in the face of the cost-of-living crisis.

CPM SUPPLY CHAIN

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 95% 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 2% being outside the EU or North America.

The top 3 categories of CPM procurement spend (accounting for more than 75%) comprise:

- Fleet Management – which is outsourced and managed by Alphabet and Lex Autolease
- Travel and Accommodation – which is managed by Inntel
- IT and telecom equipment – which is managed by Omnicom (Group IT)

Our group-wide [Supplier Code of Conduct](#) sets out the minimum standards we require from our suppliers and this includes a specific section on Prevention of Modern Slavery and Human Trafficking.

OUR UK DUE DILIGENCE AND MONITORING PROCESSES

Our internal systems ensure that the employees we engage are never 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.

Our group-wide [Business Code of Conduct](#) includes a specific obligation for the business to uphold the laws that prohibit harmful activity, and for the UK this includes the Modern Slavery Act.

Our RFP process sets out Pre-Qualifying questions as the first part of this process, with a specific question on Modern slavery. In addition to this our compliance team maintain our supplier relationship procedures, and our operations team review all current suppliers to ensure that we adhere to these.

To further enhance the management and set up new suppliers, EXL/Purchase Ledger download the companies MS statement, where they are required to publish a MS statement. In addition any inactive suppliers for +18 months will be removed from our approved supplier list and if taken back on will need to go through the same new supplier checks.

CPM COMMUNICATION & TRAINING ON SLAVERY AND HUMAN TRAFFICKING

Each year when we publish our updated Modern Slavery Statement on our company website, we also publish the updated statement on our People portal/Sharepoint site to ensure all employees see the updated statement.

All Omnicom businesses have been instructed to ensure that all their employees complete a series of mandatory training modules. New starters are also required to complete these within their first two weeks. Modules relevant to Modern Slavery include; Anti-Bribery & Corruption; Diversity, Equity & Inclusion for all employees and Ethics & Code of Conduct.

In 2022 the business published its Diversity, Equity & Inclusion Commitment. This was an important step forward for the business to recognise that whilst in the past we have developed various policy and procedures towards promoting a working environment that ensures that everyone can be their true self at work, we needed a more strategic and clearly defined plan of how we will drive DE&I forward in our business.

Since publishing this commitment the following key steps have been taken by the business:

- Partnering with EW group to support with our DE&I strategy
- DEI Steering group formed and meeting monthly at senior level
- DE&I Champions Network formed to support and communicate to Field and Head office as one group
- Field Managers DEI training launched at Field conference in Feb and all line managers and leadership attending DEI training throughout 2023
- Established Employee Resources Groups – Womens Network, Neurodiversity, BOLD, Reach and Pride
- DEI Newsletter shared with the business every quarter.

PROGRESS OVER THE LAST YEAR

- We continue to schedule reviews of all our HR policy and procedures by our employment law advisors, publishing the updated policy and procedures on Sharepoint.

- We have further embedded the supplier relationships procedure, which includes processes for RFP and procurement.
- EXL/Purchase Ledger complete supplier checks and download the companies MS statement, where they are required to publish a MS statement
- DEI is a specific strategic focus point on our Mid Term Plan (to 2026) to increase awareness and understanding and embed our DEI commitment further.
- New Health & Safety consultant appointed to ensure specialist guidance being provided in our ongoing review of our H&S policy and procedures.
- Wellbeing – mental health awareness training provided to line managers by Point 3, giving them greater confidence when supporting team members with any mental health concerns.
- All new cars being ordered since the publishing of the last statement have been hybrid. Due to delays in order lead times, the target of 90% hybrid fleet will be delayed to early 2024.
- CPM continues to take its Corporate Social Responsibility very seriously and this is evidenced by our on-going support of charities through donations and encouraging employees to use the available paid volunteering days through the Give & Gain initiative.

LOOKING AHEAD

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 with 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 relevant focuses in the coming year is to continue to embed our supplier relationships procedure and to review all current suppliers for compliance against this. This includes ensuring that the appropriate measures are in place to check compliance with the Modern Slavery Act requirements including, where applicable, a published Modern Slavery Statement.

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 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.

The UK Board remains focused on Modern Slavery, looking for opportunities to continue improving our awareness in this area.

Annually, when we publish CPM's Modern Slavery Act Statement, we will ensure that this is brought to the attention of all CPM employees. 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 budget year end which is in December.

	<p>Signed for and on behalf of CPM United Kingdom Ltd Claire Wicks, People Director, CPM UK 28th June 2024</p>
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