

ArvatoConnect: Modern Slavery and Human Trafficking Prevention Statement

August 2026

REGULATION (EU) 2016/679 ArvatoConnect

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ArvatoConnect Statement on Modern Slavery and Human Trafficking

Introduction

ArvatoConnect is committed to conducting business ethically, with integrity and in a manner that respects and upholds human rights. We recognise our responsibility to prevent modern slavery, forced labour, servitude, human trafficking and all forms of worker exploitation within our business and supply chains.

We have a zero-tolerance approach to modern slavery and human trafficking and are committed to implementing and maintaining effective systems, controls and due diligence processes to minimise the risk of modern slavery occurring anywhere within our operations or supply chain.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps ArvatoConnect has taken during the reporting period to prevent modern slavery and human trafficking within its business and supply chains.

Our Business

ArvatoConnect is a business professional services provider employing approximately 700 people across four UK sites. ArvatoConnect is a subsidiary of the Bertelsmann Group, an international media, services and education company.

ArvatoConnect's UK head office is located in Datchet, Berkshire. ArvatoConnect is registered in England and Wales under company number 03923307.

Our Commitment

ArvatoConnect is committed to ensuring that modern slavery and human trafficking have no place within our business or supply chains. We seek to promote a culture of ethical behaviour, transparency, accountability and respect for human rights across all areas of our operations.

Our commitment is supported by:

- The Bertelsmann Code of Conduct.
- The Bertelsmann Supplier Code of Conduct.
- Fair and lawful employment practices.
- Whistleblowing arrangements.
- Supplier due diligence and monitoring activities.
- Employee awareness and training programmes.

Employment Practices and Due Diligence

ArvatoConnect has implemented a range of controls and employment practices designed to prevent modern slavery and human trafficking within our operations.

These include:

- All employees receive a formal contract of employment outlining their rights and obligations.
- Employment contracts are regularly reviewed to ensure compliance with applicable employment legislation.
- All employment is freely chosen.

- Employees are paid at least the National Minimum Wage or National Living Wage, as applicable.
- Employees are enrolled into pension arrangements in accordance with legal requirements.
- Right-to-work checks are undertaken prior to employment.
- Background screening is completed where appropriate for the role.
- Salary payments are made directly into bank accounts held in the employee's own name.
- Employees are free to leave their employment subject to contractual notice requirements.
- ArvatoConnect complies with applicable legislation relating to employment, working time, health and safety, holiday entitlement and rest breaks.
- Employees are provided with information regarding support channels and reporting mechanisms during their induction.

ArvatoConnect also maintains a Whistleblowing Policy that enables employees to raise concerns confidentially and without fear of retaliation.

Supply Chain Due Diligence

ArvatoConnect expects its suppliers, contractors and business partners to share its commitment to preventing modern slavery and human trafficking and to uphold relevant legal and ethical standards within their own operations and supply chains.

Our supply chains are primarily located within the United Kingdom and Europe. Whilst we consider the overall risk within our direct supply chain to be relatively low, we recognise that modern slavery risks may exist further upstream within global supply chains.

To manage these risks, ArvatoConnect:

- Requires suppliers to confirm compliance with the Modern Slavery Act 2015 where appropriate.
- Maintains supplier due diligence processes as part of our procurement and supplier management activities.
- Applies additional assessment measures to suppliers identified as higher risk.
- Monitors higher-risk suppliers periodically to assess ongoing compliance.
- Supports and implements the Bertelsmann Supplier Code of Conduct.

Where concerns are identified, ArvatoConnect may undertake additional due diligence, request corrective actions, review the supplier relationship or, where appropriate, terminate the relationship.

Details of the Bertelsmann Supplier Code of Conduct can be found at:

[Supplier Code of Conduct - Bertelsmann](#)

Training and Awareness

ArvatoConnect promotes awareness of modern slavery and human trafficking through its governance framework, policies and training programmes.

Employees are required to complete the Bertelsmann Code of Conduct training and other mandatory training relevant to their role. New starters are introduced to ArvatoConnect's standards, policies and reporting processes during onboarding.

Managers are expected to support employee awareness and promote a culture in which concerns can be raised safely and appropriately.

Reporting Concerns

ArvatoConnect encourages employees, suppliers, contractors and other stakeholders to report any concerns regarding suspected modern slavery, forced labour, servitude, human trafficking or worker exploitation.

Concerns may be raised through management channels, the People Team or the Company's Whistleblowing arrangements. All reports are treated seriously and investigated appropriately.

Monitoring and Continuous Improvement

ArvatoConnect continually reviews the effectiveness of its controls, policies and due diligence arrangements to identify opportunities for improvement.

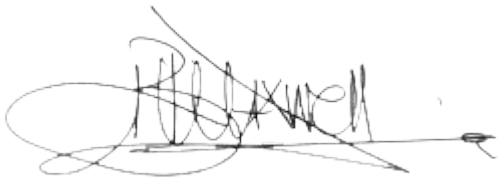
We remain committed to strengthening our approach to modern slavery prevention through ongoing monitoring, supplier engagement, employee awareness and governance oversight.

During the reporting period, no instances of modern slavery or human trafficking were identified within our operations or supply chains. This outcome reflects the effectiveness of our due diligence processes, risk assessments, and ongoing monitoring procedures designed to prevent and detect such practices.

ArvatoConnect remains vigilant and committed to continuous improvement, regularly reviewing our policies and supplier engagement to uphold the highest standards of ethical conduct.

Approval

This statement has been approved by the Board of Directors of Arvato Limited and is reviewed annually.

Signed on behalf of Arvato LimitedA handwritten signature in black ink, appearing to read 'R. B. M. N.', is written over a horizontal line. The signature is stylized and cursive.

Chief Executive Officer

Date: 14th August, 2026