

Modern Slavery & Human Trafficking Statement

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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The board of directors has overall responsibility for ensuring compliance with our legal and ethical obligations and that all those under our control also comply. Management at all levels are responsible for ensuring those reporting to them understand and comply with our obligations and are given adequate and regular training on the issue of modern slavery.

Modern slavery crimes

There are a number of crimes that are covered under the definition of modern slavery, including:

- Bonded labour – individuals who are forced into debt by paying to get a job or mandatory equipment, or have their passports taken to restrict their movements.
- Forced labour – individuals who are forced to work long hours for little or no pay in poor conditions, under verbal or physical threats to themselves or their families.
- Trafficking – individuals or groups moved from one area to another for forced or bonded practices.
- Criminal exploitation – where a victim is exploited to commit a crime.
- Sexual exploitation – including forced prostitution
- Domestic servitude – where an individual is forced to work in private households with restricted freedom and work long hours for little or no pay.

Our own business operations

Our Anti-Slavery and Human Trafficking Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Our recruitment and people management processes are designed to ensure that all prospective and current employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We take a strict approach to actions and behaviours deemed to be in breach of this policy statement, and any such incidents will be dealt with in accordance with the applicable Disciplinary Procedure. Breaches of our policy may amount to gross misconduct resulting in summary dismissal.

The HR Manager has primary and day-to-day responsibility for implementing our Anti-Slavery and Human Trafficking Policy internally, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Our supply chain

Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers.

We ask our suppliers to implement due diligence for their own suppliers and subcontractors and to ensure there is no slavery or human trafficking in their supply chain. We will terminate our relationships with suppliers if they are deemed to have breached our policy.

Reporting concerns

As part of our Whistleblowing Policy we set out that staff are expected to report any criminal offences or failures to comply with legal obligations.

Anyone who suspects a breach of our Anti-Slavery and Human Trafficking Policy, either internally or within our supply chain, should report the concern to a director of the business promptly. External parties who are unaware of director contact details may email their concerns to hq@clarksonevans.co.uk.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under our Anti-Slavery and Human Trafficking Policy, even if they turn out to be mistaken.

Statement Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015. It is approved by the Clarkson Evans Board of Directors on 14 February 2024 and constitutes our Modern Slavery and Human Trafficking Statement for 2024.