

Modern Slavery and Human Trafficking Statement

Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps Claritas Group has taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages.

Claritas Group recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking. Modern slavery and human trafficking have no place in the modern world. Our organisation is absolutely committed to preventing modern slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from modern slavery and human trafficking. We have a zero-tolerance approach to modern slavery and human trafficking, and we expect our supply chains to take the same approach.

We will comply with the Universal Declaration of Human Rights, the conventions of the International Labour Organisation and the UN's Guiding Principles on Business and Human Rights.

Due diligence and Supply Chain

Claritas will carry out appropriate due diligence to ensure that its own workforce, as well as that of its supply chain operating on its projects, is free from modern slavery.

Formal risk assessments will be carried out on our principal suppliers on each project. Staff are expected to report any concerns and management are expected to act upon them.

Claritas will ensure that its employees and members of the supply chain are actively made aware of the risks of modern slavery and how to identify them.

Claritas expects all suppliers to conduct right-to-work checks of their workforce in accordance with the Immigration, Asylum and Nationality Act 2006.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent modern slavery and human trafficking in our operations.

Modern Slavery and Human Trafficking policy sets out our commitment to acting with integrity in all of our business relationships, supported by the development and implementation of effective systems and controls.

Whistleblowing policy We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Recruitment policy Claritas use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.



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Training

In order to ensure the highest level of understanding, we require all staff within our organisation to complete training to recognise the risks of modern slavery and human trafficking in our business and supply chains.

Awareness-raising programme

As well as training staff, we raise awareness of modern slavery issues by circulating emails and posters to staff explaining:

- the basic principles of the Modern Slavery Act 2015.
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Responsibility for our anti-slavery initiatives lie with our Leadership Team who ensure compliance in their respective departments in so far as there is perceived to be a risk of encouraging, engaging or sustaining modern slavery and human trafficking.

This statement has been approved by the Board of Directors of Claritas Group and signed by Jon Wardle, the Chief Executive of Claritas Group Ltd.

Authorised by: Jon Wardle
Chief Executive Officer

Signed:



Review Date: 05 November 2021

