

Clarke Telecom Prevention of Modern Slavery Policy

Modern Slavery is a crime which occurs in many forms and for the purpose of this policy includes any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. All of these acts are normally conducted for the purposes of either personal or commercial gain and without exception result in the abuse and exploitation of an individual's human rights.

Clarke Telecom is fully committed to the eradication of Modern Slavery in all its forms and as a Company we will not engage in, nor will we condone or tolerate, any act of Modern Slavery within any aspect of our operations.

As a Company we will act transparently, ethically and with integrity both internally and across all of our business relationships. Appropriate action will be taken in response to any identified act of Modern Slavery and the processes and control measures we implement in support of this policy aim to prevent, in so far as we are able, the opportunity for acts of Modern Slavery to arise.

Our approach to Modern Slavery, including our control measures, is contained within supporting procedures. However as a minimum we will:

- Identify, by risk assessment, and prioritise which parts of our business and Supply Chain are at most risk of Modern Slavery so that we can focus on those areas
- Communicate our commitment to the Supply Chain using the Vendor Assessment, Supplier Appraisal and Procurement processes and engage with them, as appropriate, to understand the measures being taken to ensure that Modern Slavery is not occurring within their business
- Introduce and implement, based on our risk assessment, appropriate due diligence activities which enable us to confirm, to the fullest extent possible, that Modern Slavery is not occurring within our Supply Chain
- Prepare and publish on our Company website an annual Modern Slavery and Human Trafficking Statement which details the steps being taken to support the prevention of Modern slavery within our business and Supply Chain
- Through appropriate communications or training, raise employee awareness of Modern Slavery

All employees, temporary workers, or sub-contractors, who perform work at any site or location operated by Clarke Telecom, will be required to conform fully to the requirements of this policy and its supporting procedures. This includes reporting any suspected act of Modern Slavery identified within the workplace to either their Line Manager or the HR Team for investigation/action.

This policy will be reviewed annually, as a minimum, to ensure its continued effectiveness. The next review, to be conducted by the HR Director, is scheduled for March 2021.



Nigel Newton
Managing Director
Clarke Telecom Ltd

1 April 2020

Prevention of Modern Slavery

1.0 Introduction

- 1.1 Clarke Telecom is fully committed to the eradication of Modern Slavery in all its forms.
- 1.2 As a Company we will not engage in, nor will we condone or tolerate, any act of Modern Slavery within any aspect of our operations or within our Supply Chain and we will take appropriate action where any such activity is identified.
- 1.3 The procedures outlined below detail the Company's approach to Modern Slavery and the control measures implemented in support of its prevention.

2.0 Definitions

- 2.1 For the purposes of this policy Modern Slavery is considered to encompass, but may not necessarily be limited to, any act of slavery, servitude, bonded, forced or compulsory labour, child labour or human trafficking. Definitions of such acts are:

2.1.1 Human Trafficking

Human trafficking involves men, women and children being brought into a situation of exploitation through the use of violence, deception or coercion and being forced to work against their will in jobs or conditions to which they did not agree. Human trafficking not only occurs across international borders but also nationally and even within individual communities.

2.1.2 Bonded Labour

Bonded labour is one of the least known, but most widespread, forms of slavery across the world. A person is said to become a bonded labourer when their labour is demanded, as a means of repayment for a loan, with the labourer ultimately working for very little or no pay. Debts created by bonded labour activities are often passed onto the next generation of the family thereby continuing the bond.

2.1.3 Child Labour

Child labour is defined as labour resulting from any form of slavery or practice similar to slavery including the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour.

A child is defined as any individual under the age of 15, or the local minimum employment age, or the mandatory school age whichever is the higher. Where a particular country permits a worker to be employed under the age of 15, the principles of this policy will apply and any such individuals will be classed as children and unable to be employed in the provision of services or goods to Clarke Telecoms.

Where employment involves work in hazardous conditions, no individual under the age of 18 must be employed on such activities. To assist in determining what constitutes hazardous conditions and to avoid the exposure of anyone under the age of 18 to such conditions, the following principles will be applied:

- Work which exposes an individual to the possibility of any form of physical, psychological or sexual abuse
- Work carried out underground, under water, at height or in confined spaces
- Work with dangerous machinery, equipment or tools

Prevention of Modern Slavery

- Work which involves the manual handling or transportation of heavy loads
- Work in any environment which may expose an individual to hazardous substances, agents or processes, or to temperatures, noise levels or vibration, which may cause harm to health
- Work under difficult conditions including long hours, night work, or work where an individual may be unreasonably confined to the employers premises for long periods of time

The temporary employment of younger persons within work placement, internship, apprenticeship or other seasonal work, which is common and customary practice within industry, is exempted from the requirements of this policy providing that any such employment:

- Does not interfere with compulsory schooling and has the permission of the school in respect of work placements
- Is being undertaken with the full permission of the individual's parent or guardian
- Is directly supervised by a competent person
- Does not violate any relevant legislation
- Has been subject to a full assessment in respect of health, safety and well being

2.1.4 Forced Labour

Forced labour is defined as any work or labour which is extracted from an individual under the threat of penalty for its non-performance and for which the worker does not offer themselves voluntarily. It does not necessarily follow that the provision of wages or other compensation to an individual indicates that the work is not forced or compulsory.

Forced labour may include, but is not limited to the following:

- Work undertaken by an individual where that individual has no choice whatsoever about whether to undertake the work or not
- The work or service of prisoners if they are hired out or placed at the disposal of private individuals, companies or others involuntarily and without the supervision of the relevant public authorities
- Involuntary labour required by the authorities including assistance in construction, agriculture and other public works
- Bonding through debt
- Work required to punish opinion or expression of views ideologically opposed to established political, social or economic systems

3.0 Responsibilities

3.1 Board of Directors

3.1.1 Overall responsibility for the effective implementation of the Company's Policy and supporting Procedures in respect of Modern Slavery.

3.2 Line Managers

3.2.1 Responsible for ensuring acts of Modern Slavery do not occur within their areas of responsibility.

Prevention of Modern Slavery

3.2.2 Responsible for ensuring that their team members are appropriately informed and understand this requirement of the Company's Modern Slavery Procedure.

3.3 Employees

3.3.1 Responsible for complying with the requirements of this procedure as appropriate in the delivery of their duties.

3.3.2 Responsible for reporting any suspected act of Modern Slavery that they identify within the workplace to either their Line Manager or the HR Team for investigation/action.

3.3.3 For the purposes of this procedure the term employee includes any temporary worker, or sub-contractor who performs work on any site operated by Clarke Telecom.

3.4 Procurement Team

3.4.1 Responsible for ensuring the requirements of the Company's Modern Slavery procedures are brought to the attention of the Supply Chain and incorporated into the Vendor Assessment process.

3.4.2 Responsible, in conjunction with other nominated personnel, for evaluating Supply Chain submissions to ensure they comply with the Company's Policy in respect of Modern Slavery.

3.5 Sustainability and Assurance Team

3.5.1 Responsible, in conjunction with other nominated personnel, for evaluating Supply Chain submissions to ensure they comply with the Company's Policy in respect of Modern Slavery.

3.6 HR Team

3.6.1 Responsible, in conjunction with other nominated personnel, for evaluating Supply Chain submissions to ensure they comply with the Company's Policy in respect of Modern Slavery.

3.6.2 Responsible for arranging the investigation of reported suspected acts of potential Modern Slavery within the workplace and preparing recommendations, as appropriate, for consideration by the Board of Directors.

4.0 **Procedure**

4.1 Communication and Awareness

4.1.1 The Company will ensure that it regularly and clearly communicates its commitment to the eradication of Modern Slavery and the requirements of this policy to all employees and members of its Supply Chain. We will also take appropriate steps to raise awareness of Modern Slavery issues across our workforce and in particular the commitment and requirements contained within our Modern Slavery Policy.

4.2 Assessment of Modern Slavery Risk

4.2.1 Clarke Telecom is a UK based company and the location and nature of the physical work we undertake is such that any opportunity for internal acts of Modern Slavery are considered to be extremely unlikely and as such are considered to be of very low risk. However as part of the internal audit process, audit teams will be tasked to monitor for the existence of potential acts of Modern Slavery within the area being audited (e.g. site, office location, and suppliers).

Prevention of Modern Slavery

4.2.2 The Company's Tier 1 Supply Chain is primarily UK based and we believe this to be a positive contributory factor towards the prevention of Modern Slavery within our business.

It is recognised however that within an extended supply chain beyond Tier 1 and particularly where that supplier works in an industry, or is based in an overseas territory which is known to be impacted by Modern Slavery issues, the potential for exposure to risk from Modern Slavery may be increased. We therefore expect that appropriate due diligence activities which address Modern Slavery issues are undertaken, reported and addressed by Suppliers at the relevant points within the extended Supply Chain.

In order to identify the extent of Supply Chain risk the Company will undertake the following risk assessment activities:

- Map the Tier 1 Supply Chain
- Prioritise the Tier 1 Supply Chain on Spend Profile to identify areas where we can add most leverage
- Determine Risk Criteria:
 - Location of Production or Service
 - Industry Sector
 - Relationship with Supplier
 - Any existing information held on risk
- Undertake more detailed risk assessment on any areas identified as a High or Medium Risk within our Tier 1 Supply Chain through the use of a Self-Assessment Questionnaire which will be sent to these suppliers for completion
- Review completed Self-Assessment Questionnaires and conduct audits as required on High Risk Tier 1 Suppliers to ensure compliance with our Modern Slavery Policy.

The Company will utilise various sources of information for guidance and support in its risk assessment process including:

- The Global Slavery Index
- Corruption Perceptions Index
- US Department of Labour List of Goods and Suppliers

4.2.3 Suppliers who are assessed as low risk will be required to confirm, as a minimum, that they:

- Have a policy on Modern Slavery, which covers both their own activities and those of their suppliers
- Implement appropriate procedures to ensure compliance with their Modern Slavery Policy
- Produce an annual statement on Modern Slavery and Human Trafficking where the company has an annual turnover of £36m or more
- Will accept audits of their Modern Slavery procedures as considered appropriate, by Clarke Telecoms

Prevention of Modern Slavery

4.3 New Suppliers

4.3.1 As part of the Vendor Appraisal and Assessment process, new suppliers will need to demonstrate that they:

- Have a policy on Modern Slavery, which covers both their own activities and those of their suppliers
- Implement appropriate procedures to ensure compliance with their Modern Slavery Policy
- Produce an annual statement on Modern Slavery and Human Trafficking where the company has an annual turnover of £36m or more
- Will accept audits of their Modern Slavery procedures as considered appropriate, by Clarke Telecoms.

4.3.2 Where a new supplier does not meet the requirements of 4.3.1 above they must agree, as a minimum, to comply with the requirements of the Clarke Telecom policy and procedures in respect of Modern Slavery until such time as they have developed and implemented their own, such development being undertaken within an agreed timescale.

4.4 Reporting Acts of Modern Slavery

4.4.1 Employees who believe they have witnessed any potential act of Modern Slavery within the workplace should report such act to either their Line Manager or a member of the HR Team. All reports will be treated as confidential and will be fully investigated.

4.4.3 Alternatively Employees can contact the CIRAS Confidential Reporting Line on one of the following:

- Freephone - 0800 4 101 101
- Text 07507 285887

4.5 Review

4.5.1 The requirements of the Company's Policy and Procedures on Modern Slavery will be reviewed annually by the Head of HR and the Board of Directors to ensure their continued suitability and effectiveness.

4.5.2 The Company will also issue an annual statement, publicly available via its website, containing information relating to:

- The nature of the business, its structure and supply chains
- The Company's policy relating to Modern Slavery
- The due diligence processes followed in relation to slavery and trafficking within the business and its supply chain
- The parts of the business where a risk of Modern Slavery is considered to exist and the steps that have been taken to assess and manage that risk
- The effectiveness of the processes used to ensure Modern Slavery is not taking place within the workplace