

# Modern Slavery Statement

This statement sets out Clark Contracts (Group) Ltd and Clark Contracts Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 01 November 2017 to 31 October 2018.

As part of the construction industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Company structure and supply chains

This statement covers the activities of Clark Contracts (Group) Ltd and Clark Contracts Ltd which is a wholly owned subsidiary:

Clark Contracts was founded in 1978 as a specialist joinery company. Over the past 41 years the firm has diversified and moved into specialist areas of construction, refurbishment and maintenance across the UK.

We only use subcontractors and suppliers who have been accepted onto our Company Supply Chain which we have operated since 2005. In 2014 we engaged Constructionline to manage our supply chain. Constructionline is a UK government owned certification service for construction related contractors, consultants and material suppliers, and has been developed to reduce duplication in the pre-qualification process.

## Countries of operation and supply

The company currently only operates in the United Kingdom.

## Risk Assessment

The following activities are considered to be at low risk of slavery or human trafficking:

- The use of agency workers for labour intensive activities
- Subcontractor packages with high labour content

## Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The Financial Director is responsible for putting this policy in place. In order to do so, the Finance Director has reviewed all Company processes in its supply chains and sought information from suppliers where relevant. The Finance Director is responsible for reviewing this policy annually.
- **Risk Assessments:** The responsibility for human rights and modern slavery risk analysis lies with the directors responsible for each division within the company.
- **Investigations/due diligence:** In conjunction with the Finance Director, the HR Manager is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** Awareness training and employee responsibilities training will be carried out by the HR Manager.

## Policies on modern slavery

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing Policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it

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easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can speak to the Finance Director.

- **Employee Code of Conduct:** The Company's rules of conduct makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supplier/Procurement code of conduct:** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their workers working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment Policy:** The Company uses 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.

## Due Diligence processes

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new suppliers [this may be part of a more general human rights or labour rights assessment];
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Conducting supplier audits or assessments through [the Company's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Creating an annual risk profile for each supplier;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans [provide examples];
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

## Performance Indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring all staff to have completed training on modern slavery by 30<sup>th</sup> April 2019.
- Developing a system for supply chain verification whereby the Company evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains, whereby the Company evaluates all existing suppliers.

## Training for staff

The Company requires staff within the Company to complete training on modern slavery. The Company's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

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- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licencing Authority and "Stronger Together" initiative.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

### Board Approval

This statement has been approved by the Company's board of directors on 30<sup>th</sup> April 2019, who will review and update it annually.

Director's signature:



Director's name: John Mooney

Date: 30/04/2019