MODERN SLAVERY & HUMAN TRAFFICKING POLICY

1) Introduction

The following Modern Slavery statement has been published in accordance with the Modern Slavery Act 2015. It outlines the steps Clarke takes as a business to prevent modern slavery and human trafficking in our own operations and supply chains for the financial period 1st October 2023 to 30th September 2024.

We recognise that Modern Slavery is a growing global issue, and we understand our responsibility to prevent, mitigate and remediate where necessary, the risks of human trafficking, forced, bonded and child labour and to respect human rights in our operations and our supply chain. 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.

2) Our Business and Supply Chains

Clarke provides specialist end to end services to the mobile telecommunications, electric vehicle charging, and data centre markets; Acquisition, Design and Construction including the establishment of new mast sites, upgrading existing sites, rigging, installation and commissioning, providing power and metering to mast sites. Within the EV charging activities Clarke provides survey, design, supply, installation, commissioning, and ongoing service management to charging infrastructure. Data centre activities include design, installation, decommissioning and maintenance of infrastructure.

We currently employ 360 FTE staff and operates throughout Great Britain and Northern Ireland. The company offices and warehouses are located at:

- Manchester – Head office
- Redhill – Regional office and warehouse
- Glasgow – Regional office
- Newbury – Project office
- Liverpool – Project office
- Middleton – Warehouse

At the current time, none of our staff are agency workers. Clarke recruits either directly or via a reputable recruitment partner. These partners are required to successfully complete our supply chain due diligence process, prior to be accepted as a recruitment partner.

We have a supply chain of over 400 suppliers who are primarily UK based, with only two operating outside the UK. We believe this to be a positive contributory factor towards the prevention of Modern Slavery within our business.

3) Responsibilities

All employees, temporary workers, or sub-contractors who perform work at any site or location operated by Clarke, 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.

Board of Directors

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

Line Managers

- Responsible for ensuring acts of Modern Slavery do not occur within their areas of responsibility.
- Responsible for ensuring that their team members are appropriately informed and understand this requirement of the Company's Modern Slavery Procedure.

Employees

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

Procurement Team

- 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.
- Responsible for evaluating Supply Chain submissions to ensure they comply with the Company's Policy in respect of Modern Slavery.
- Responsible for monitoring the supply chain and carrying out annual checks to ensure compliance.

HR Team

- 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) Due Diligence processes & Identification of risk

Clarke 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 is considered to be extremely unlikely.

Although our supply chain is primarily UK based, it is recognised that within an extended supply chain 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.

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.

Where a new supplier does not meet the requirements, they must agree as a minimum to comply with the requirements of the Clarke 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.

Having established Medium-High areas of risk, we conduct further due diligence by carrying out a detailed risk assessment through the use of a Self-Assessment Questionnaire which will be sent to these suppliers for completion, to understand whether there is evidence of Modern Slavery issues, and whether there are enough controls in place.

4.1) Determine Risk Criteria

- Location of Production or Service
- Industry Sector
- Relationship with Supplier
- Any existing information held on risk.

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

Slavery and human trafficking in supply chains: guidance for businesses - Transparency in supply chains: a practical guide

https://www.stronger2gether.org/

Ethical Trading Initiative Base Code Guidance: Modern Slavery

Walk Free Foundation Tackling Modern Slavery in Supply Chains

Respect International Resource Centre

5) Reporting Acts of Modern Slavery

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.

Alternatively, employees can call a confidential whistleblowing reporting line 020 3117 2520, where they can raise concerns and be assured, they will be fully addressed. Calls will be treated in complete confidence.

6) Our Activities During 2023/24

- Monitored our new Supply Chain and their processes, to understand the activities they undertake, to ensure that Modern Slavery and Human Trafficking is not taking place within our supply chain.
- Issued annual checklists to approved suppliers to ensure they are complying with the act.
- Uploaded our supplier list to the TISC Report portal to monitor supply chain compliance.
- Modern Day Slavery course for all new employees with annual refresher course for existing employees.

6.1) Training

Training and raising awareness remains a key focus for the business and our extended supply chain, building on the work of the previous years.

Members of the procurement team have taken part in the stronger2gether tackling modern slavery in supply chains course and have been given increased responsibility for understanding and mitigating Modern Slavery risk. Furthermore, we are continuing to raise awareness across the business through training via toolbox talks and encouraging staff to use the online resources available from organisations such as Stronger2gether to gain wider knowledge.

7) Our Objectives

- Modern Slavery awareness training is mandatory for all Clarke employees and we will ensure 100% staff complete this training.
- To undertake a further review of our existing supply chain to ensure that any existing suppliers have not changed their status in terms of "risk" by completing the Modern Slavery Self-Assessment Questionnaire.
- Continue to monitor compliance through the TISC Report portal.
- Procurement team to undertake refresher training from stronger2gether.
- Identify and use opportunities for collaboration to verify and help resolve risk issues.



Ian Marshall

Managing Director

Date 28th March 2025