CLIPPER
CONTRACTING GROUP LTD

CLIPPER CONTRACTING GROUP LIMITED MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2025

Introduction from the Board of Clipper Contracting Group Limited

Slavery and human trafficking remain a blight on our global society and we all have a responsibility to be alert to the risks, however small, within our own business and in the wider supply chain.

This statement sets out Clipper Contracting Group Limited's actions to understand and prevent all potential modern slavery risks related to its business pursuant to section 54(6) of the Modern Slavery Act 2015 (the "Act") and represents the statement for the financial year ending on the 30th June 2025.

Clipper Contracting Group Limited operates in multiple industries, including but not limited to; Driving, Engineering, Industrial, IT, Legal, Medical, Office/Admin workers, Sales & Marketing, Social/Care and Telecoms Engineering.

Our staff are expected to report concerns and management are expected to act upon any reports.

Organisational Structure

Clipper Contracting Group Ltd employs and contracts out specialist workers in the UK for use by third parties. We provide services, skills and expertise across Construction, Health, Education, IT, Engineering and Social Care sectors. Clipper Contracting Group Ltd has an annual turnover in excess of £180m.

Our Supply Chain

Clipper Contracting Group Limited is committed to acting ethically and expect all of their suppliers to make the same commitment. Clipper Contracting Group Limited will address any failures by their suppliers to meet such standards on a case by case basis and ultimately may lead to their ceasing to trade with any such supplier.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery policy reflects Clipper Contracting Groups commitment to always act ethically and with integrity throughout our business relationships. We expect all employees to raise any concerns of slavery they encounter so it may be addressed by a senior member of staff.

Due Diligence for Slavery and Human Trafficking

As part of our policy and procedures to identify any risk, Clipper Contracting Group Ltd ensures that;

- Our systems are designed to ensure that at least the National Living Wage or National Minimum Wage is paid to all employees
- Using our bespoke registration platforms, all worker files must use a unique email address, helping identify duplicity of any workers and patterns that may indicate instances of modern slavery.
- Where viable, we run regular Assignment Checks to ensure that workers hours and pay are accurate and that their working environment matches our requirements.
- We always complete a Right to Work check, ensuring that those workers do have the right to work in the UK and are aware of the rights and responsibilities working in the UK gives
- Where possible we speak with agency partners to ensure that the worker is provided with adequate support throughout their assignment.
- We aim to always build long standing relationships with suppliers and clients and always make clear our expectations regarding the business behaviour.
- We will also aim to work with suppliers that are members of their appropriate trade association.
- We are aware that an increasing practice within the construction industry is for a group or 'gang' of workers to engage via one person's limited company. Where this practice occurs, we refuse to pay

the workers into anything other than their own personal bank account. Whilst more prevalent a number of years ago, the introduction of the IR35 off-payroll reforms have largely eliminated this arrangement which can be seen as a positive step. We continue to help educate our recruitment agency partners in regards to the off-payroll reforms.
• Whistleblowing Policy. The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation.
• With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

Supplier Adherence

We have a zero tolerance to slavery and human trafficking. We expect all those in our supply chain and any contractors to comply with the values set out in this document.

Training & Awareness

To guarantee a high level of understanding and engagement with this policy and the risks associated with modern slavery and human trafficking in our supply chain or business, we provide training to relevant members of staff. All Directors have been briefed on this subject.

2025 has seen us build on our internal training module that we put together. We created a modern slavery flyer, which is issued to every worker that registers with us, as part of their on-boarding pack. It helps identify the key signs of modern slavery.

Measuring Effectiveness in Combating Slavery and Human Trafficking

In the last financial year, there were no modern slavery related risk incidents reported to management.

It is worth noting a potential incident that demonstrates the robustness of our systems; a number of workers were identified as having the same sort code and account number. This was flagged and investigated, the outcome being that these were building society accounts with unique reference numbers.

We use the following key performance indicators (KPI's) and systems to measure how effective we have been in combatting slavery and human trafficking in any part of our business or supply chain;

• Completion of Audits by Managers and Business Development Managers.
• Use of Labour monitoring and Payroll Systems including identical bank account alert system
• Worker aftercare call and email after their first payment to check they received it
• Level of communication and personal contact with both workers and the next level in the supply chain to ensure their level of compliance and understanding matches our own.

We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if there are no reports received from our staff, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Declaration

This statement has been approved by the organisation's board of directors and is made in pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the businesses slavery and human trafficking statement.

Date of Board of Directors approval: 12/11/2025

Signed (Director):
Name: Rob Wilks, Director, 12/11/2025