MODERN SLAVERY STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and applies to the Claverley Group and its subsidiary companies (referred to in this statement as 'the Company').

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with the disclosure obligations under this act. We expect the same high standards from all of our contractors, suppliers and other business partners.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

All employees, suppliers and contractors of the Company should familiarise themselves with the contents of the policy.

Company Structure
Our business Claverley Group Ltd (together with our subsidiary companies; MNA Ltd, PCS, PCP, Kennedy Publishing, Cubiquity Media, HPCi and Signature Publishing) is a diversified media company. We create, print and procure engaging content for multiple platforms, across print, online, mobile and tablets. The group manages and reports its businesses in the following segments: news services, recruitment, print procurement, digital planning software development, and marketing.

Our supply chain includes; paper manufacturers, ink and paper suppliers, technology and other office equipment, professional services from solicitors and other professional advisors, technology, office cleaning, facility services, maintenance suppliers, motor services/suppliers, toy suppliers and occasionally for promotional purposes the suppliers of food.

The Company has multiple business locations for each of its subsidiaries, all of which are located in the United Kingdom.

Claverley Group Ltd is controlled by a board of directors, however the Group Finance Director has overall responsibility for the application of this policy.

Definition of modern slavery
The Company considers that modern slavery encompasses:

- Human trafficking
- Forced work through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment
The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review and risk assessment of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

We are committed to improving our processes with regard to the Modern Slavery Act and acting ethically and with integrity in our business relationships. We will put in place effective systems and controls to ensure slavery and human trafficking is eradicated if and where it is discovered in our supply chains.

Steps
The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Putting measures in place to identify and assess the potential risks to our supply chains.
- Undertaking impact assessments of our services upon potential instances of slavery.
- Creating action plans to address the risk to modern slavery.
- Embedding a zero-tolerance policy towards modern slavery.
- Providing training to staff on modern slavery.

Potential exposure
The Company considers its main exposure to the risk of slavery and human trafficking to exist from imported supplies from sources from outside of the UK and EU as these are potentially more at risk or slavery/human trafficking issues. The level of management control required for these sources will be continually monitored as part of the Company's due diligence processes.

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In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Company directors and senior management have responsibility for implementing this policy statement and its objectives and shall provide adequate training where required to ensure that slavery and human trafficking does not take place within the Company or its supply chains.

Slavery compliance
The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All concerns regarding Modern Slavery should be raised with; a company director, senior manager, or a member of the HR team who will then take the relevant action with regard to the Company's legal and ethical obligations.

This policy statement will be reviewed annually and published on the company website.

Name: Gareth Williams

Position: Group Finance Director