

Modern Slavery and Human Trafficking Statement

Financial Year Ending 31 July 2025

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by DeMontfort Fine Art Limited (Trading as Clarendon Fine Art) during the financial year ending 31 July 2025 to prevent modern slavery and human trafficking within our business and supply chains.

1. Our Business and Structure

Clarendon Fine Art operates as part of the De Montfort Fine Art group of companies, with the parent company being Clarendon Fine Art Holdings Ltd. We are a UK-based publisher, distributor and retailer of fine art. We operate retail galleries across the United Kingdom, US and onboard cruise ships under the brands Clarendon Fine Art and Atelier Galleries.

Our principal product categories include:

- **Original artwork**, sourced from individual artists, agents or third-party publishers
- **Limited edition artwork**, predominantly manufactured in-house using printing and hand-finishing techniques
- **Sculpture**, sourced internationally including UK-produced installation works
- **Framing materials**, sourced primarily through UK and EU-based suppliers, with limited international sourcing via UK distributors

We operate predominantly within the UK retail and manufacturing sectors. While we assess our direct operational risk as comparatively low, we recognise that risk may arise within extended international supply chains and third-party service providers.

2. Our Commitment

Clarendon Fine Art is committed to conducting business ethically and with integrity. We have a zero-tolerance approach to modern slavery and human trafficking and expect similar standards from those with whom we work.

We do not knowingly engage in business with any organisation involved in slavery, servitude, forced labour or human trafficking.

We recognise that modern slavery can be complex and hidden within supply chains. While no organisation can eliminate risk entirely, we are committed to taking proportionate and reasonable steps to identify and mitigate potential risks.

3. Risk Assessment

During the reporting period, we have considered modern slavery risk across:

- International sourcing of artwork and materials
- Third-party manufacturers and finishing processes
- Logistics and transportation providers
- Recruitment agencies and temporary labour providers
- Contractors and facilities suppliers

We assess that:

- The majority of our manufacturing activities are conducted within the UK under direct operational oversight.
- International sourcing and multi-tier supply chains may present comparatively higher risk.
- Use of third-party service providers requires ongoing diligence and clear contractual expectations.

Risk is assessed proportionately based on geography, sector, supplier profile and nature of contractual relationship. In addition we consider publicly available country and sector risk indicators when assessing higher-risk supply chain exposure.

4. Supplier Relationships and Due Diligence

We maintain established relationships with suppliers, distributors and contractors and communicate our expectations regarding lawful and ethical conduct as part of onboarding and contractual arrangements.

Our approach includes:

- Setting clear expectations regarding compliance with applicable laws, including modern slavery legislation.
- Risk-based consideration of higher-risk supplier categories.
- Retaining the ability to cease trading where serious ethical concerns arise.

We do not currently conduct formal external audits of all suppliers. However, where appropriate, we may seek further assurances or clarification regarding labour practices. We do however expect suppliers to take appropriate steps within their own supply chains to prevent modern slavery.

5. Recruitment and Employment Practices

We operate recruitment and people management processes designed to reduce the risk of forced labour or exploitation within our workforce.

These include:

- Verification of right to work in the UK for all directly employed staff.
- Written contracts of employment setting out terms and conditions.
- Compliance with National Minimum Wage and Working Time Regulations.
- Engagement with reputable recruitment agencies where temporary labour is used.
- Clear grievance and whistleblowing procedures.
- Confirmation that no recruitment fees are charged by agencies to workers.
- Confirmation that all staff are paid directly into bank accounts (to avoid wage withholding risk).

We are committed to creating a respectful, non-discriminatory working environment in which individuals feel confident raising concerns without fear of retaliation.

6. Policies and Reporting

Our commitment to ethical business conduct is supported by internal policies including:

- Whistleblowing Policy
- Recruitment and Selection Policy
- Equality, Diversity and Inclusion Policy
- Disciplinary and Grievance Procedures

Employees are encouraged to raise concerns through internal reporting channels. All reports are taken seriously and investigated appropriately. Concerns relating to modern slavery may also be reported to the UK Modern Slavery Helpline (08000 121 700).

7. Training and Awareness

We provide awareness to relevant managers and employees regarding modern slavery risks as appropriate to their role, particularly within procurement, operations and people management functions.

Training needs are reviewed periodically as part of our broader compliance framework.

8. Effectiveness and Continuous Improvement

During the reporting period, we have:

- Reviewed supplier onboarding processes to ensure ethical expectations are clearly communicated.
- Maintained internal controls relating to right-to-work compliance.
- Considered risk exposure across international sourcing arrangements.

Over the next reporting period, we intend to:

- Further formalise supplier risk categorisation.
- Review contractual language relating to ethical compliance.
- Continue raising awareness among relevant managers.

We recognise that modern slavery risk management requires ongoing review and development.

9. Governance

The Board receives periodic updates on compliance matters, including modern slavery risk. The Board has overall responsibility for ensuring compliance with the Modern Slavery Act 2015. This statement has been approved by the Board of Directors and will be reviewed annually.

Signed on behalf of the Board

Helen Swaby
Chief Executive Officer
31 January 2026