



# **Modern Slavery Statement 2025–2026**

Covering the financial year 1 January 2025 – 31 December 2025

# Clad Safety

## Financial Year 1 January 2025 – 31 December 2025

Clad Safety is committed to driving out acts of modern-day slavery from within its own business and from within its supply chains. The Company acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 on behalf of Clad Safety Ltd. It has been approved by the Board of Directors, is published on our website alongside our previous statements, and has been submitted to the UK Government's Modern Slavery Statement Registry.

Our FY2025 statement has been prepared in line with the Home Office's updated statutory guidance, Transparency in Supply Chains (March 2025), and reflects our commitment to the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Modern slavery is a persistent problem that requires long-term solutions, and we acknowledge that there are no quick fixes. Our clients rely on us to handle this issue effectively so that they can feel secure when choosing to work with us.

## What is modern slavery?

Modern slavery is an overarching term used to describe its various forms: human trafficking, forced and compulsory labour, bonded labour, and slavery.

Human trafficking is a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion. Forced labour is any work or service which people are not doing voluntarily, and which is exacted under the threat of some form of punishment. Bonded labour is demanded as a means of repayment of a debt or a loan. Slavery is a situation where a person exercises (perceived) power of ownership over another person.



**In accordance with the Home Office's updated statutory guidance (Transparency in Supply Chains, March 2025), this Modern Slavery Statement covers the following six areas:**

**Organisation structure and supply chain**

- Our structure, and our primary, secondary and labour supply chains

**Policies**

- Policies relating to slavery and human trafficking

**Due diligence and remediation**

- Due diligence processes, and how issues are remediated when found

**Assessing risks**

- Risk assessment and management, including beyond Tier 1

**Monitoring effectiveness**

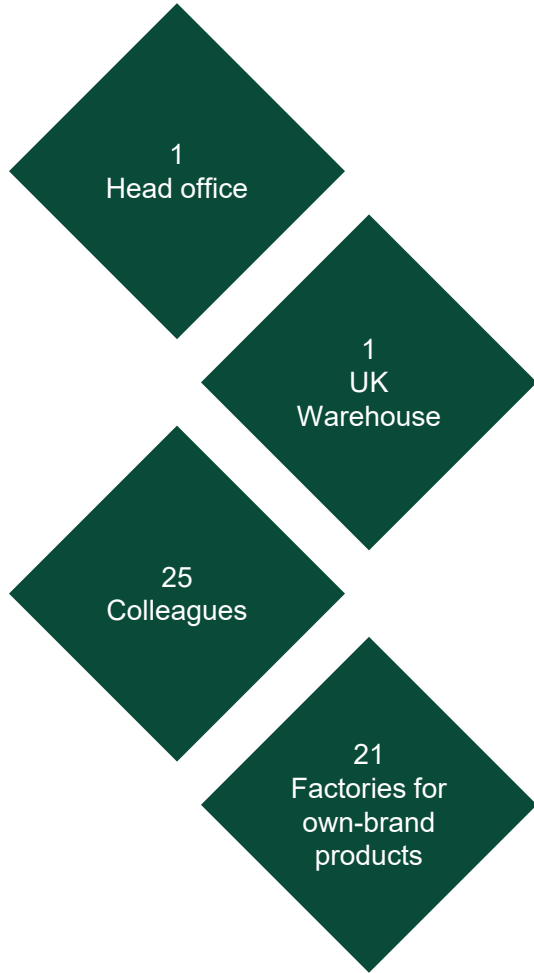
- Key performance indicators, with year-on-year comparison

**Cascading knowledge**

- Training on modern slavery and trafficking

This statement was approved by the Board of Directors of Clad Safety Ltd in July 2026 and is published on our website, where our previous statements remain available.

It has been submitted to the UK Government's Modern Slavery Statement Registry.



## Organisation structure and supply chain

Clad Safety's mission is to improve the working life and productivity of our customers by supplying innovative clothing and solutions that protect and enhance the value of people. Established in 1989, Clad Safety is a privately owned company that has been successfully delivering a high standard of service to our customers for over 35 years.

Clad Safety is one of the leading suppliers of workwear, uniforms and PPE to corporations throughout the UK, via our team in Knaresborough, North Yorkshire. Our own-brand products are manufactured at 21 factories across 6 countries. Our stock holding makes next-day delivery a reality, and our in-house logo service personalises products with embroidery or heat-applied logos.

### How we define our supply chain

In line with the updated statutory guidance, we interpret our supply chain broadly. It includes our primary value chain (own-brand manufacturing and the branded product ranges we resell), our secondary value chain (freight and logistics, warehouse services, embroidery and printing consumables, and other procured goods and services), and our labour supply chain (how and from where workers are recruited, including any agency labour).

This Modern Slavery Statement has been published in accordance with the UK Modern Slavery Act 2015 and was approved by the Directors of Clad Safety.

## Message from the Directors

Clad Safety Ltd is committed to driving out acts of modern-day slavery from within its own business and from within its supply chains. The Company acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process incorporates a review of the controls undertaken by the supplier. Where issues are identified, our first response is to work with the supplier to remediate them in the interests of affected workers.

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we can confirm their identities and that they are paid directly into an appropriate, personal bank account.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking. The Company Directors and Senior Management shall take responsibility for implementing this policy statement.

This statement was approved by the Board of Directors and is signed on their behalf by the Managing Director.

Neil Trevvett  
Managing Director  
15 July 2026

## Policies in relation to modern slavery and human trafficking

Clad Safety is committed to upholding human rights and ethical trade practices. Our policies and procedures cover our own operations and supply chains to ensure that we conduct our business in a responsible and ethical manner. We are committed to internationally recognised human rights and ethical standards, including the ILO conventions, and we follow the ETI base code principles. Our policies provide the framework in which we operate and play a critical role in ensuring that we have proper controls in place to manage and monitor ethical compliance, aligned with our commitment to preventing modern slavery, human trafficking, forced labour and exploitation.

### Our policies

These are reviewed annually and updated when necessary to remain aligned with international standards and best practice.

- Ethical Supply Chain Policy
- Labour Standards Policy
- Responsible Sourcing Policy
- Modern Slavery Policy — shared across our branded supplier network during 2025

These policies are published on our website: <https://cladsafety.co.uk/csr/>. We require our suppliers to comply with our policies and applicable laws. Where our policies and applicable laws cover the same topic, suppliers must follow the one that gives greater protection to workers.

### Code of Conduct

As part of onboarding, suppliers are asked to agree to comply with our Code of Conduct, which establishes a fundamental framework of standards reflecting differences in laws, customs and economic conditions around the world. It is aligned with the ETI base code and ILO standards.

### Whistleblowing and worker voice

Our whistle-blowing policy is accessible to all colleagues and provides details of the independent PROTECT hotline and how to report any allegations of modern slavery, fraud, misconduct or wrong-doing, in line with the company's grievance policies. Beyond our own colleagues, we review the grievance mechanisms available to workers in our supply chain as part of every factory audit, and work with Verisio and our factories to strengthen them.

## Due diligence and remediation

New factories are asked to complete our onboarding process prior to any orders being confirmed. As part of this we request 3rd-party audits dated within the last 12–24 months.

**Accepted audit methodologies:** SMETA 2 or 4 Pillar, BSCI, SA8000, WRAP

**Accepted audit firms:** any APSCA member firm with a verified CSCA-level auditor

**Accepted announcement types:** semi-announced with a minimum 2-week window, or fully unannounced. Fully announced audits will not be accepted.

Audits are managed through our online portal, which we provide without charge to our factories. We look for ongoing improvement, supporting factories to reduce any non-conformities that may arise, and request updated audits every 1–2 years in line with the type of audit provided.

## Verisio — enhancing our due diligence

Clad Safety has partnered with Verisio, a global team of experienced auditors and supply chain officers, since 2023. Verisio supports the management of audits, can conduct unannounced audits to uncover potential issues such as child labour, falsified documentation or serious health and safety breaches, and responds swiftly to concerns such as whistleblowing reports — dispatching auditors to investigate and provide guidance on remediation. Where issues are found, our approach is remediation first: we work with the factory on a corrective action plan in the interests of affected workers, and disengagement is a last resort.

## Extending visibility beyond Tier 1

Verisio has helped us map our supply chain to Tier 1, providing a visual representation to identify areas for risk prioritisation. During 2026–2027 we will begin mapping priority Tier 2 suppliers — fabric mills and major trim suppliers — prioritised by spend and country risk, with an initial focus on cotton origin.



## Our commitment

With a wide-reaching number of industries in our portfolio, the customer is at the core of our operations and our purpose is to keep those people safe at work. This purpose extends to colleagues at our head office and warehouse, to those who design and make our products across our supply chain, and to the communities in which we live.



### Living Wage Employer

Clad Safety is an accredited Living Wage Employer. All colleagues, including regular third-party contracted staff, are paid at least the real Living Wage.



### Sedex member since 2016

As members of Sedex, Clad Safety believe in operating with full supply chain transparency to ensure that our business is conducted ethically and fairly, particularly with regard to fair wages and working conditions throughout our supply chain. We expect our suppliers to uphold a high standard in their ethical and social working practices, and use extensive questionnaires and independent audits to ensure all our suppliers meet this standard.



### Verisio partner since 2023

Specialising in supporting businesses with responsible supply chain management to drive positive social and environmental change; assisting Clad Safety in going beyond audits and increasing our due diligence.



### Ethical Trade Initiative and international frameworks

Clad Safety is not currently a member of the ETI, but we align our Ethical Code of Conduct with its base code, which is based on the standards of the International Labour Organisation (ILO) as a minimum standard of good practice. Our approach is informed by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.



## Risk assessment and management in our supply chain

Whilst we don't own the factories that produce our goods, we know we have a responsibility to seek ways to protect all workers from modern-day slavery or human trafficking, as well as promoting health, safety and welfare in our supply chain. When it comes to modern slavery, we cannot know what we cannot see — so we continue to focus on growing our level of transparency and deepening our understanding of inherent and residual risk within our supply chain.

### Countries we currently source in

India · Pakistan · China · Bangladesh · Turkey · UK



We reference the Global Slavery Index and country-level risk data to grade the inherent risk of each sourcing country, and prioritise our audit and engagement activity accordingly.

Manufacturing site ethical audits are graded on non-conformities against the ETI base code. We work with our factories directly, and through Verisio, to close any non-conformities.

Where factories are not able to supply a valid audit from our preference list, we will consider others by exception to reduce audit fatigue. Where factories do not hold audits and it is not financially viable for them to do so, we have created our own supplier questionnaire to encourage best practice.

### Raw-material and Tier 2 risk

We recognise that in the garment sector, significant modern slavery risk sits beyond Tier 1 — in fabric mills, trim suppliers and raw-material origins, particularly cotton. Our Tier 2 mapping programme (2026–2027) will prioritise these areas by spend and country risk.

### Regulatory horizon

We monitor developments including the UK Government's review of Section 54 reporting requirements and the EU Forced Labour Regulation, which will prohibit products made with forced labour from the EU market from 2027, and we are preparing our supply chain visibility accordingly.

## Incidents, remediation and outcomes in FY2025

In line with the updated statutory guidance, we report transparently on issues identified during the year and the action taken in response. Figures below cover 1 January – 31 December 2025.

0

confirmed instances of modern slavery  
identified in our operations or supply chain

0

whistleblowing / grievance reports received  
and investigated

100%

audit non-conformities closed within agreed  
corrective action timescales

### Our approach to remediation

Where an audit or report identifies a non-conformity, the factory agrees a corrective action plan with defined timescales, monitored through our audit portal and, where needed, verified by Verisio follow-up visits. Our first priority is always the interests of affected workers: remediation over withdrawal. We will only exit a factory where it is unwilling to remediate, and we do so responsibly.

### Worker voice

Grievance mechanisms available to workers are reviewed at every audit. During 2026 we will work with Verisio to strengthen direct worker-voice channels at our highest-risk sites.



## Key performance indicators

Six-monthly supplier mapping reports are shared with the Directors detailing performance against the following KPIs. Prior-year figures are shown for comparison, in line with the updated statutory guidance.

### Performance against KPIs

85% of Tier 1 manufacturing sites to hold valid 3rd-party ethical audits (last 1–2 years, dependent on audit type)

FY2025: 85% · FY2024: 79%

90% of staff trained in modern slavery within 6 months of joining the business

FY2025: 83% · New KPI

60% of Tier 1 suppliers to provide their own modern slavery policy by end of 2025

FY2025: 55% · New KPI

Minimum 75% of factories to achieve green through our RAG rating in 2025–26 (working towards 100%)

FY2025: 70% · FY2024: 60%

100% of Tier 1 suppliers to receive a copy of Clad's Modern Slavery Statement

FY2025: 100% · New KPI

Top 85% of Tier 1 suppliers (by spend) to complete our supplier questionnaire by end of 2025

FY2025: 72% · New KPI

## Training on modern slavery and human trafficking

During 2024 a 3rd-party trainer delivered modern slavery training to all head office and warehouse colleagues, covering the Modern Slavery Act, types of modern slavery, modern slavery in the UK, spotting the signs and what to do. This training now forms part of induction for all new starters, and a refresher was delivered during 2025. We recognise that our ability to drive change alone is limited, and we participate in initiatives where we can leverage wider resources from across the industry.

## **Summary of progress in the financial year ending 31 December 2025:**

- Modern slavery policy established and shared across our branded supplier network — completed in 2025
- Continued to increase visibility of our manufacturing sites — 6-monthly reports shared with Directors
- Tier 1 audit coverage moved from 79% towards our 85% target; RAG green rating from 60% towards 75%
- Modern slavery training embedded into induction for new starters, with a refresher for all colleagues
- This statement submitted to the UK Government's Modern Slavery Statement Registry for the first time

## **Priorities and KPIs for 2026–2027**

- Begin mapping priority Tier 2 suppliers (fabric mills and trims), prioritised by spend, country risk and cotton origin
- 100% of factories to achieve green through our RAG rating; 85% of Tier 1 suppliers audited or assessed
- Strengthen direct worker-voice channels at our highest-risk sites, working with Verisio
- Extend due diligence to our secondary value chain: logistics, warehouse services and resold branded ranges
- Publish annually within six months of financial year-end, retain previous statements online, and submit each statement to the Registry
- Monitor the UK Government's review of Section 54 and prepare for the EU Forced Labour Regulation (2027)