

# Modern Slavery

This statement has been published following Section 54 of the Modern Slavery Act 2015

## Introduction

Modern slavery exists in the form of servitude, forced or compulsory labour and human trafficking for personal or commercial gain. Claughtons has a zero-tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity in all of our business activities and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or the businesses throughout our entire supply chain.

This statement relates to actions and activities undertaken during the financial year. It sets out the actions we have taken to understand and address all potential areas of risk about modern slavery, and the steps we are taking to ensure that there is no slavery or human trafficking throughout the Claughtons business and its supply chains.

## Our Supply Chains

We are committed to working only with highly reputable suppliers; this is to ensure that their due diligence and ethical practices are aligned with ours. The relationships we enjoy with our suppliers are well-established and long-lasting. The monitoring and regular review process enable us to ensure ongoing compliance by all suppliers to our Values and Policies.

## Recognised Areas of Risk

The following activities or areas of business are considered to present a potentially higher risk of modern slavery or human trafficking:

- Hiring agency workers via external recruitment suppliers.
- Wider supply chain, such as 2nd and 3rd tier suppliers.

## Due Diligence Processes

In relation to the recruitment of new employees within the Cloughtons business, we conduct appropriate proof of eligibility to work checks in line with legislation and provide all new employees with clear, legally compliant employment contracts. We also ensure that:

- All payroll processes and deductions from wages adhere to legislation.
- All employees are paid fairly, and we adhere to National Minimum Wage (NMW) legislation.
- We keep our policies up-to-date in support of fairness and equality and have clear reporting routes for any grievances or issues relating to poor treatment of employees or agency workers.
- All external staffing suppliers adhere to equivalent policies and procedures.

In relation to the hiring of agency workers, we build and maintain close working relationships with our external staffing suppliers to ensure our policies and procedures are communicated correctly.

## Training & Awareness

We aim to:

- Promote awareness among all staff within the business through the communication of our Anti-Slavery and Human Trafficking Policy.
- Provide further relevant training to all those involved in managing our supply chain relationships on how to recognise signs of modern slavery.

## Reporting of Concerns

If any Cloughtons employee has reason to suspect activities relating to modern slavery or human trafficking within either our business or our supply chain, they must immediately report these suspicions to their Departmental Manager.

Cloughtons recognises that the ongoing development of our current initiatives will improve our handling of issues relating to the prevention, detection and handling of modern slavery within our business and our wider supply chain.

This statement was approved by the Managing Director of Cloughtons.