

## **Slavery and Human Trafficking Statement**

The Modern Slavery Act 2015 (MSA 2015) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences.

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery – where ownership is exercised over an individual
- Servitude – involves the obligation to provide service imposed by coercion
- Forced and compulsory labour – all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking – involves arranging or facilitating the travel of another with a view to exploiting them

The MSA 2015 requires large businesses, with sales of over 36 million, to be transparent about their efforts to eradicate Slavery and Human Trafficking. Clark & Partners Ltd are not contained within this category and are therefore not required by legislation to provide a statement but have chosen to do so to demonstrate that slavery and human trafficking is not acceptable to our business.

We are a small business whose organisation is composed of a management structure where every employee is responsible either to an immediate line supervisor / manager, or directly to a Director & Managing Director at the head of management.

The Business is involved in the installation, service, maintenance and repair of mobility products and equipment and the adaptation of motor vehicles. The supply chain involved in this process are businesses who provide parts and raw materials used in the process, and they range from large / major companies to small / minor companies.

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. Employees are required to avoid any activity that might lead to a breach of this.

Identifying potential victims of modern slavery can be a challenge because this crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. If it is believed or suspected a breach of or conflict with this policy has occurred or may occur, the immediate supervising person must be notified or it should be reported in accordance with the Company's whistleblowing policy. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible.

In situations of being unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, this should be raised with the immediate supervising person. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Any employee who breaches this may face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they are found to have been involved in modern slavery.

As part of the organisation's induction process and throughout workers' employment with us, we train and expect all staff to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations and standards. This is an ongoing process. If any worker is found in breach, we ensure suitable support, training or disciplinary action is taken where this is required.

In relation to our supply chains, we use our reasonable endeavours to build our awareness of the practice of the third parties we work with. We aim to work with our colleagues and suppliers to ensure collaboration to remedy or mitigate any of the risks previously outlined.

In conclusion:-

- We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals.
- Workers are free to choose whether to join a trade union or not and we offer an environment which is free from harassment and unlawful discrimination.
- We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation.
- We do not engage in forced or involuntary labour and have a zero tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct.

Signed :



Date : 22.02.21

PAUL BENNETT – MANAGING DIRECTOR