

CLARIVOS UK

Modern Slavery and Human Trafficking Statement

1st January 2020

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st August 2019 and 31st July 2020.

The statement sets down CLARIVOS UK's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of CLARIVOS UK which are as follows:

CLARIVOS UK is a specialist consultancy organisation focused on delivery high quality financial performance solutions to UK and international organisations. These consultants work in CLARIVOS UK offices or on customer locations.

The Company currently operates in the following countries:

UK and Ireland.

Internationally covered by CLARIVOS Corporate global policies that align with the standards included in this document.

CLARIVOS employees professionally qualified consultants. These consultants during the recruitment process must prove they are UK citizens or have Home Office approval to work and/or reside in the UK.

High Risk Activities

Due to the nature of CLARIVOS's business and personal CLARIVOS is unlikely to encounter Modern Slavery internally. However, they need to be aware and understand how to report any instances when they may be on customer sites that have a higher risk. All CLARIVOS employees must be approved to work and/or reside in the UK and

this is a fundamental check during the recruitment and onboarding process.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 **Policies:** The HR Manager is responsible for creating and reviewing policies. The process by which policies are developed is based on latest best practice and UK Government guidelines and rules.
- 1.2 **Risk assessments:** The Health and Safety Manager and the relevant Project Manager on a particular customer project or location is responsible for risk assessments in respect of human rights and modern slavery by a process of due diligence prior to the commencement of any particular project.
- 1.3 **Due diligence:** All Directors, Line Managers, Project Managers and individual consultants are responsible for due diligence in relation to being aware of known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all new staff to read and understand the CLARIVOS employee policy on our internal HR portal and to review at least annually to ensure they fully understand the policy and how to identify any instances of slavery within CLARIVOS and also on customer sites they visit as part of their duties. Onboarding induction also covers modern slavery as a standard and fundamental awareness and how to report any instances internally or externally.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically as in all our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- 2.1 **Whistleblowing policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Code of Conduct:** The Company Code of Conduct contained in the Company Employment Equity and Recruitment, Selection and Employment Policy Documents on our Intranet sets down the actions and behavior expected of employees when representing the Company.
- 2.3 **Corporate Code of Conduct and Business Ethics Policy:** The code of Conduct and Business Ethics (herein referred to as "the Code of Conduct") serves as a guide to CLARIVOS employees, stakeholders and customers to ensure a high

standard of integrity. For purposes of this Code of Conduct, any reference to CLARIVOS includes all related and interrelated parties as defined in the Companies Act.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company produces regular reports to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all relevant staff to have completed training on modern slavery and by ensuring use of monitored recruitment and onboarding to ensure compliance with the Modern Slavery Policies set out here and updated regularly and Government guidelines and legislation.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed by the CLARIVOS Board and updated as necessary. The CLARIVOS Board of Directors fully endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Ketan Patel
Position: Managing Director
Date: 1st January 2020
Signature: