

Policy Statement

Modern slavery and human trafficking

1 Statement

- 1.1 This statement is made in conformance with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Clearcomm Group has taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages.
- 1.2 Clearcomm's Code of Conduct prohibits modern slavery. We will comply with the Universal Declaration of Human Rights, the conventions of the International Labour Organisation and the UN's Guiding Principles on Business and Human Rights.
- 1.3 Clearcomm will carry out appropriate due diligence to ensure that its own workforce, as well as that of its supply chain operating on its projects, is free from modern slavery.
- 1.4 Formal risk assessments will be carried out on our principal suppliers on each Clearcomm project. Staff are expected to report any concerns and management are expected to act upon them.
- 1.5 Clearcomm will carry out internal and external audits of selected projects in order to monitor and assess the risks of modern slavery. Clearcomm will ensure compliance through site induction due diligence, management meetings and site visits.
- 1.6 Clearcomm will ensure that its employees and members of the supply chain are actively made aware of the risks of modern slavery and how to identify them.

2 Policy application

- 2.1 Clearcomm has put in place fair and transparent recruitment and resourcing procedures in relation to labour practices, false employment and modern slavery in accordance with relevant legislation and standards.
- 2.2 The requirements made of the supply chain in regard to modern slavery are communicated and contracted upon through our Supplier Code of Conduct and Sustainable Procurement Policy. Clearcomm expects all suppliers to conduct right-to-work checks of their work-force in accordance with the Immigration, Asylum and Nationality Act 2006, which will be reinforced when a worker attends their first site induction where their papers will be verified.
- 2.3 Clearcomm Group Limited will seek to work in partnership with all suppliers to tackle and combat the threat of human trafficking and modern day slavery across the construction industry and throughout our supply chain, in accordance with international environmental, social and ethical standards.
- 2.4 A Modern Slavery and Human Trafficking procedure has been produced to complement this policy.
- 2.5 This policy was signed off by the Managing Director of Clearcomm Group Limited on 18th June 2020

Stuart Evans, 

Managing Director 18/06/2020