

Modern Slavery Policy



Together

We are **Clemark Group**,

Registered in England & Wales under **Associate Enterprises Limited** and including all wholly owned subsidiaries. We also trade as Assent, Lorators, Clemark.

Our integrated management system covers the provision of consultancy, auditing, training, creative, technology and other professional services delivered in-person and remotely to ensuring the quality of products/services and the security of all information.

1) Introduction

We are committed to conducting our business in a responsible and ethical manner and recognise that modern slavery is a heinous crime that violates basic human rights. Therefore, we are dedicated to preventing modern slavery in all of our operations and supply chains.

Our commitment to eradicating modern slavery is guided by the UK's Modern Slavery Act 2015 and our own ethical principles, which reflect our respect for human rights, fair labour practices, and environmental stewardship.

Our aim is to ensure that our business operations are transparent, and that we take all necessary measures to prevent and address modern slavery in our supply chains.

2) Purpose

The purpose of this policy is to:

- Set out our commitments to preventing modern slavery
- Define responsibilities within the organisation
- Outline the steps we take to identify, prevent, and address risks

3) Scope

This policy applies to:

- All employees (permanent, temporary, apprentices, and interns)
- Contractors, consultants, and third parties
- Suppliers, partners, and any organisation we do business with

It applies across all regions where we operate.

4) Definitions

Modern slavery includes, but is not limited to:

- *Forced labour* – work performed involuntarily under threat

- *Human trafficking* – movement of people for exploitation
- *Debt bondage* – labour demanded as repayment of a debt
- *Child labour* – work that deprives children of their childhood or education

5) Our Commitment

We will:

- Prohibit all forms of modern slavery in our operations and supply chain
- Treat all workers fairly, with dignity and respect
- Comply with applicable laws and regulations
- Promote ethical practices and transparency

6) Roles and Responsibilities

Board and Senior Leadership

- Provide oversight and approve the Modern Slavery Policy
- Ensure adequate resources for implementation

Managers and “Heads of”

- Ensure teams understand and comply with this policy
- Identify and escalate risks

Procurement / Supply Chain

- Conduct due diligence on suppliers
- Ensure ethical standards are built into contracts

Employees and Contractors

- Remain vigilant to risks
- Report concerns promptly

7) Due Diligence

We implement due diligence processes including:

- Supplier onboarding checks
- Supplier Code of Conduct requirements
- Ongoing monitoring and periodic reviews

Where appropriate, we may conduct audits or request evidence of compliance.

8) Training and Awareness

We provide training to employees as appropriate to:

- Raise awareness of modern slavery risks
- Help recognise warning signs
- Ensure understanding of reporting procedures

Training is prioritised for employees in procurement, HR, and leadership roles.

9) Reporting Concerns

We encourage the reporting of any concerns related to modern slavery.

Reports can be made via:

- Line management
- Top management / Board
- Whistleblowing channels (confidential and, where possible, anonymous)

We are committed to ensuring that no one suffers retaliation for raising concerns in good faith. See section 3 (Whistleblowing) of our Ethics and Anti-Corruption Policy Pack.

10) Incident Management

If modern slavery is identified:

- We will investigate promptly and confidentially
- Take appropriate corrective action
- Work with suppliers to address issues where possible
- Terminate relationships where appropriate

We seek to support affected individuals where feasible and appropriate.

11) Monitoring and Review

We consistently monitor our anti-modern slavery processes and regularly review this policy to ensure effectiveness and identify continual improvement opportunities.

12) Related Policies

This policy should be read alongside:

- Ethics & Anti-corruption Policy Pack
- Human Rights Policy
- Supplier Code of Conduct

12) Approval

We recognise that eradicating modern slavery is an ongoing process and that there is always more that can be done. We are committed to regularly reviewing and updating our policies and practices to ensure that we are doing all we can to prevent modern slavery in our operations and supply chains.

This statement has been approved by the board of directors and will be reviewed annually to ensure its continued relevance and effectiveness.