

# Modern Slavery & Human Trafficking Statement

FINANCIAL YEAR END 31/03/2022

A Clarke & Co (Smethwick) Ltd is committed to preventing modern slavery and human trafficking from occurring within any part of its business and supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31/03/2022.

Established in 1933, A Clarke & Co are a family run business and are one of the leading privately owned multi-service transport organisations in the UK. We employ 530 people and operate within the United Kingdom.

Our supply chain involves receipt of goods direct from manufacturers, customers and their contractors for onward transport. Clarke Transport contracts with customers and suppliers, including temporary work agencies who supply labour.

We are committed to preventing slavery and human trafficking occurring in any of our corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.



Our Anti-Slavery Policy reflects our commitment to acting both ethically and with integrity in all our business relationships, and to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains.

We acknowledge our responsibilities in accordance with the Modern Slavery Act 2015 and advise that we do not tolerate any conduct that contributes to, encourages, or facilitates human trafficking, child labour, forced or compulsory labour, or any other human rights abuses.

In order to support this statement and ascertain and mitigate the risk of working with a supplier who may have slavery in their supply chains we will continue to:

- Identify and assess potential risk of slavery in our operations and that of our suppliers
- Mitigate the risk of slavery through performing due diligence on suppliers deemed at risk
- Monitor potential risk areas
- Educate our employees regarding the types of factors which can indicate whether any worker (permanent or temporary) within our supply chain may be subject to undue influence
- Protect whistleblowers

Conduct rigorous checks to verify the identity of each worker and verify the workers right to work in the United Kingdom

As such, we will not work with any organisation within our supply chain that is unable to demonstrate a corresponding commitment to this subject, irrespective of whether they are required to do so statutorily or otherwise. Where possible we build long standing relationships with our customers and major suppliers, making clear our expectations of business behaviour.

## **ANTI-SLAVERY POLICY**

### **Introduction**

This policy supports the commitment of the Company to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for, or on our behalf, in any capacity, including employees, Directors, officers, agency workers, contractors, consultants and any other third-party representative.

We expect all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

### **What do we mean by Modern Slavery?**

Modern slavery can take many forms. The Modern Slavery Act 2015 (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

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

#### How we seek to embed our Anti-Slavery Policy in practice

To underpin our policy commitments, we have introduced the following measures:

- Conducting risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery
- Where appropriate, as informed by our risk assessment, we will engage directly with suppliers in respect of our Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses

## Communication and employee awareness training

The Company will ensure that relevant staff receive adequate training on this policy and any supporting processes applicable to their role, in addition to recognising the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery.

## Breaches of this Policy

Any breaches of this policy will be taken seriously and will be dealt with on a case by case basis.

The breach of this policy by an employee, Director or officer of the Company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and could warrant sanctions up to, and including, dismissal from employment.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

## Status of this Policy

This Anti-Slavery Policy will be reviewed by the Company's Board of Directors on a regular basis.

This policy does not give contractual rights to Company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

The Board of Directors believe that driving out slavery in any form from all aspects of our supply chains is fundamental to the aims of our business and, accordingly, have approved this statement.

A rectangular box containing a handwritten signature in black ink, which appears to be 'Bill Clarke'.

Signed

Bill Clarke, Commercial Director

06/04/2022