

## Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## Our Commitment

Our company values are the guiding principles which underlie the way in which we judge our actions and undertake our work. Core to our business is ensuring that we operate in an honourable and responsible manner in everything we do and deliver a built environment that we can all be proud of. We can only do this by seeking to act with the highest ethical and moral standards. We firmly believe that these objectives can only be achieved by working to ensure that everyone involved in our projects, whether they be our own staff or contributing through our supply chain, are treated with respect, dignity, and humanity. We commit to working collaboratively with all our people including those who work with us as part of the supply chain to deliver what we hope will be lasting change within our industry and society. Our senior management team provides strategic direction to ensure we not only comply with the Modern Slavery Act 2015 but demonstrate continual improvement across our operations to tackle the challenges we face.

The following Statement has been published in accordance with the Modern Slavery Act 2015 and sets out the actions Clipfine Group and its subsidiaries (Clipfine Holdings, Clipfine Limited, Clipfine Security Limited, Clipfine Construction Limited, Clipfine Facility Management Limited and Retreat to Eat Limited) have taken in the previous financial year (June 2020– May 2021) to ensure that our business and our industry is as resilient as possible to modern slavery and unethical labour practices. This Statement also looks ahead to the next financial year and indicates what we intend to focus on, given the lessons we have learnt and knowledge we have gained from our work to date.

## Steps Taken

At Clipfine, we are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

At Clipfine we support recognised global human rights and fair working conditions for persons working on our projects, in our workplaces and in our supply chain.

We ensure that working conditions, hours, wages, and benefits comply with applicable national and local laws and relevant UN's International Labour Organization (ILO), conventions.

We have zero tolerance of any form of human trafficking or of a child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages. A child is anyone below the age of 15, or below any higher minimum age specified by local law.

We do not allow any practice that would restrict the free movement of employees. Such practices can include requiring employees to hand over identification documents, passports or work permits as a condition of employment.

We recognise and respect employees' right to freedom of association and collective bargaining, where permissible by law.

We respect the United Nations Universal Declaration of Human Rights (<http://www.un.org/en/documents/udhr/>) and recognise our responsibility to observe those rights that apply to our performance toward our employees and the communities in which we operate.

## Supply Chain

All suppliers must undertake to work in accordance with Clipfine's Policies.

Suppliers shall ensure that all factories and premises used in the manufacture and supply of products and services are working towards meeting the provisions of the Ethical Trading Initiative (ETI) Base Code, ([www.ethicaltrade.org](http://www.ethicaltrade.org)).

Where suppliers intend to use temporary or agency staff, they should seek to ensure that any labour providers supplying such staff are fully compliant with Clipfine's Policies, or an equivalent of its relevant core principles.

Additionally, it is the duty of suppliers when they intend to further subcontract part of their work to another subcontractor, after having obtained permission to do so from Clipfine, that they make explicitly clear to their subcontractor that they too will be bound by the Clipfine Policies or an equivalent of its relevant core principles.

Suppliers shall comply not only with all domestic employment legislation but also with all applicable International Labour Organization (ILO) conventions and protocols and the United Nations Universal Declaration of Human Rights.

This policy applies to all employees of the Clipfine Group and is reviewed annually and approved by the company's board of director. This policy was revised and updated on 06.11.2021.

Date: Nov 2021

Signed:



T. MacCarron  
Chairman

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