MODERN SLAVERY & HUMAN TRAFFICKING POLICY

CLIPFINE
GROUP OF COMPANIES

Introduction

Clipfine provides construction logistics and corporate support services to a wide range of clients throughout the UK. This policy statement sets out the approach of the Clipfine Group; Clipfine Holdings Limited and its subsidiaries; Clipfine Limited; Clipfine Security Limited; Clipfine Construction Limited, and Clipfine Facilities Management Limited (hereafter referred to as Clipfine) have taken to date and that Clipfine intends to take throughout the financial year with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Clipfine Holdings Limited's slavery and human trafficking statement for the financial year ending May 2025.

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.

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.

As part of our strategy to identify and mitigate risk we ensure comprehensive staff screening and right to work checks before deployment and expect the same level of checks to be carried out by all of our supply chains.

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 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.

Further identifications of risks, together with steps taken to prevent and manage those risks, and due diligence processes in relation to slavery and human trafficking in business and supply chains;

The Global Slavery Index provides significant evidence that labour standards risks could be present in construction and property supply chains, in the production of construction materials, delivery of construction activities. To identify and mitigate the risks of slavery and human trafficking, Clipfine makes informed decisions regarding the procurement and management of labour, goods and services, utilising the following:

- Clear definition and contractual terms setting out our expectations of our suppliers (as listed in our policies listed above).
- Identification of issues and risks (using Supplier Ethical Data Exchange – Sedex product and sector risk-profiling) to inform procurement decisions.
- Achilles Building Confidence and other prequalification tools to assess UK contractor and supplier compliance; and further due diligence of international suppliers using Sedex. These tools assess suppliers against labour standards, health and safety, environmental and business ethics criteria, identifying issues and risks.
- Training for site staff, leadership teams and supplier development on slave labour and human trafficking risks and how to spot the signs of potential issues.
- Collaboration with our clients, peers and suppliers.
- Company onboarding process which verifies individuals identity, right to work and online checks verify the provided inductees' bank details match the identity documentation to deter potential Gang Masters.

Code of Conduct

As part of our Code of Conduct, all employees, contractors, and suppliers are expected to comply with all relevant laws and regulations pertaining to modern slavery and human trafficking. This includes conducting due diligence on our supply chain partners to ensure that they share our commitment to ethical labour practices and do not engage in any form of exploitation. Additionally, all employees are required to undergo training and education on identifying and reporting any suspected instances of modern slavery or human trafficking. The reporting of all concerns are handled in accordance with Clipfine's Whistleblowing Policy.

Furthermore, we are committed to collaborating with industry organisations, government agencies, and non-governmental organisations to continuously improve our policies and practices in combating modern slavery and human trafficking. We believe that by working together with our stakeholders, we can make a meaningful impact in eradicating these heinous practices from our industry and society at large. Our company will not tolerate any form of modern slavery or human trafficking and will take swift and decisive action against any individual or organisation found to be in violation of this policy.

Supply Chain

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

We operate supplier vetting to ensure effective modern slavery arrangements are in place before engagement. As a condition of onboarding, suppliers and labour agencies must evidence a current modern slavery policy, staff training, ethical recruitment practices (including no worker-paid fees), right-to-work checks, transparent contracts and fair pay/hours. These requirements must be flowed down through their own supply chains.

All suppliers and labour agencies are risk-assessed against modern slavery risk and categorised Low/Medium/High using factors such as sector, geography, labour intensity, subcontracting depth, migrant/temporary labour use and past performance. The depth and frequency of checks and audits scale with this rating. Assessments and outcomes are recorded and reviewed at least annually.

Clipfine conducts annual labour practices audits on our supply chain to ensure our company standards are met by our supply chain.

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).

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 sub-contractor, after having obtained permission to do so from Clipfine, that they make explicitly clear to their sub-contractor 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 directors.

Date: November 2025

Signed:

T. MacCarron
Chairman

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