

Clarke Management System		DOCUMENT No: POL 10 Version: 06
MODERN SLAVERY AND HUMAN TRAFFICKING POLICY		

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Document Revision History

Version	Date	Author	Summary of changes
1	08/04/2021	Fran Hugo	First statement published on new document format covering tax year 6th April 2020 to April 5th 2021.
2	01/10/2022	Fran Hugo	Statement to cover company financial year 01/10/21 to 30/09/22.
3	01/10/2023	Fran Hugo	Statement to cover financial year 01/10/22 to 30/09/23.
4	10/10/2023	Fran Hugo	Formatting updated
5	28/03/2025	Fran Hugo	Statement to cover financial year 01/10/23 to 30/09/24.
6	05/05/2026	Fran Hugo	Statement to cover financial year 01/10/24 to 30/09/25.

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1) Introduction

The following Modern Slavery statement has been published in accordance with the Modern Slavery Act 2015. It outlines the steps Clarke took as a business to prevent modern slavery and human trafficking in our own operations and supply chains for the financial period 1st October 2024 to 30th September 2025.

In line with emerging international reporting guidance, Clarke recognises that some recommended Level 2 disclosures (such as full multi-tier supply chain mapping, labour broker detail and worker voice mechanisms further down the supply chain) are not yet fully available or evidence-based. During the 2024–25 reporting period our focus has therefore been on establishing strong Level 1 foundations, governance, training and risk screening controls. Further maturity and enhanced evidence will be developed during the 2025–26 financial year for inclusion in future statements.

2) Organisational Structure

2.1) Company Size, Sectors and Services

Clarke Telecom provides specialist end to end services to the mobile telecommunications, electric vehicle charging, power networks, and data/technology markets; Acquisition, Design and Construction including the establishment of new mast sites, upgrading existing sites, rigging, installation and commissioning, providing power and metering to mast sites.

Within the EV charging and power infrastructure activities Clarke provides survey, design, supply, installation, commissioning, and ongoing service management to charging infrastructure and power networks under the “Clarke Connect” brand. Data centre/technology activities include design, installation, decommissioning and maintenance of infrastructure, also under Clarke Connect.

We currently employ approximately 360 FTE staff and operate throughout Great Britain and Northern Ireland. The company offices and warehouses are located at:

- Manchester – Head office
- Redhill – Regional office and warehouse
- Glasgow – Regional office
- Newbury – Project office
- Liverpool – Project office
- Middleton – Warehouse

At the current time, none of our staff are agency workers. Clarke recruits either directly or via a reputable recruitment partner. These partners are required to successfully complete our supply chain due diligence process, prior to be accepted as a recruitment partner.

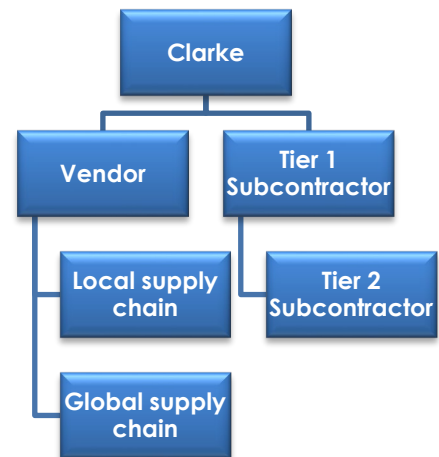
2.2) Supply Chain Structure

Clarke is an installer/service provider. We do not manufacture or assemble any products ourselves, so our supply chain consists of the following main groups:

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- **Vendor:** materials or equipment suppliers. These can be wholesale suppliers or bespoke made-to-order manufacturers. All our vendors are UK-based.
- **Subcontractor:** installation labour to provide additional installation/service capability and geographical coverage, and specialist services (logistics, plant, consultancy). All our sub-contractors are UK-based.

The majority of our supply chain are long-term relationships which supports an ongoing good level of trust, transparency, and engagement to align to Clarke's ESG objectives.



2.3) Supply Chain Understanding

Our wholesale materials importers with a global supply chain respectable, established organisations that state they have a clear understanding of their global supply chain.

Contractual agreements, policed by our own audit teams, ensure that we have visibility and control over any Tier 2 subcontractors. No subsequent lower tier subcontracting is permitted.

2.4) Stakeholder Engagement

In the 2024-25 financial year, we have engagement with the following organisations to support with high-level supply chain mapping:

- Supply Chain Sustainability School
- Renew Holdings PLC Aligned Procurement Forum

2.5) Information Gathering

Clarke utilises various sources of information for guidance and support for legislative compliance, best practice and risk management including:

- [TISC Report](#)
- [Home Office Modern Slavery Guidance](#)
- [Stronger2gether](#)
- [Ethical Trading Initiative Base Code Guidance: Modern Slavery](#)
- [Walk Free Foundation Tackling Modern Slavery in Supply Chains](#)
- [Respect International Resource Centre](#)
- [Supply Chain Sustainability School](#)

2.6) Continuous Improvement

Workshops are scheduled for spring 2026 with the Supply Chain Sustainability School and the Renew Aligned Procurement team to help us undertake detailed supply chain mapping.

3) Company Policy

We recognise that Modern Slavery is a growing global issue, and we understand our responsibility to prevent, mitigate and remediate where necessary, the risks of human trafficking, forced, bonded and child labour and to respect human rights in our operations and our supply chain.

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As a Company we will act transparently, ethically and with integrity both internally and across all of our business relationships. Appropriate action will be taken in response to any identified act of Modern Slavery and the processes and control measures we implement in support of this policy aim to prevent, in so far as we are able, the opportunity for acts of Modern Slavery to arise.

All employees are required to adhere to the Code of Conduct and Business Ethics Policy, and all suppliers are required to adhere to the Supplier Code of Conduct. Company procurement practices are covered by the Ethical Sourcing Policy. These policies have been developed in line with the [UN Guiding Principles](#) and [ETI Base Code](#). The policies specifically reference modern slavery and state Clarke's policy on:

- recruitment (including prohibiting the use of worker-paid recruitment fees)
- responsible purchasing practices
- incentives to mitigate modern slavery
- freedom of workers to terminate employment
- freedom of movement
- freedom of association and collective bargaining
- prohibiting any threat of violence, harassment and intimidation
- prohibiting compulsory overtime
- prohibiting child labour
- prohibiting confiscation of workers' original identification documents
- access to remedy, compensation and justice for victims/survivors of modern slavery

3.1) Modern Slavery Risk Management Responsibilities and Governance

All employees, temporary workers, or sub-contractors who perform work at any site or location operated by Clarke, will be required to conform fully to the requirements of this policy and its supporting procedures. This includes reporting any suspected act of Modern Slavery identified within the workplace to either their Line Manager or the HR Team for investigation/action.

Board of Directors

- Overall responsibility for the effective implementation of the Company's Policy and supporting procedures in respect of Modern Slavery.

Line Managers

- Responsible for ensuring acts of Modern Slavery do not occur within their areas of responsibility.
- Responsible for ensuring that their team members are appropriately informed and understand this requirement of the Company's Modern Slavery Procedure.

Employees

- Responsible for complying with the requirements of this procedure as appropriate in the delivery of their duties.
- Responsible for reporting any suspected act of Modern Slavery that they identify within the workplace to either their Line Manager or the HR Team for investigation/action.
- For the purposes of this procedure the term employee includes any temporary worker, or sub-contractor who performs work on any site operated by Clarke.

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Procurement Team and Supply Chain Manager

- Responsible for ensuring the requirements of the Company's Modern Slavery procedures are brought to the attention of the Supply Chain and incorporated into the Vendor Assessment process.
- Responsible for evaluating Supply Chain submissions to ensure they comply with the Company's Policy in respect of Modern Slavery.
- Responsible for monitoring the supply chain and carrying out annual checks to ensure compliance.

HR Team

- Responsible for arranging the investigation of reported suspected acts of potential Modern Slavery within the workplace and preparing recommendations, as appropriate, for consideration by the Board of Directors.

3.2) Communication and Enforcement

Company policies, including any updates, are communicated to employees through the internal communications, intranet and the annual mandatory training (see section 5).

Policies and updates for the supply chain are communicated through supplier reviews, annual onboarding documentation renewal/review, and through ad-hoc communications as required.

3.3) Continual Improvement

Throughout 2026, we will be working with the Supply Chain Sustainability School and the Renew Aligned Procurement forum to further develop and refine our policies and procedures to incorporate best practice.

4) Risk Management

Clarke is a UK-based company and the location and nature of the physical work we undertake is such that any opportunity for internal acts of Modern Slavery is considered to be low, based on the location and nature of our operations.

Although our supply chain is primarily UK based, it is recognised that within an extended supply chain and particularly where that supplier works in an industry or is based in an overseas territory which is known to be impacted by Modern Slavery issues, the potential for exposure to risk from Modern Slavery may be increased. We therefore expect that appropriate due diligence activities which address Modern Slavery issues are undertaken, reported, and addressed by Suppliers at the relevant points within the extended Supply Chain.

4.1) Risk Assessment Frequency

Risk assessments are undertaken on each supplier when onboarding or when we become aware of any significant change in a supplier's circumstances e.g. change of ownership or a change in the services or materials supplied that could potentially introduce a new modern slavery risk.

4.2) Risk Assessment Governance

The procurement team and Supply Chain Manager are responsible for the risk assessments.

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4.3) Identifying and Assessing Risks

The risk criteria takes into consideration:

- Location of Production or Service
- Industry Sector
- Relationship with Supplier
- Any existing information held on risk.

4.4) Continuous Improvement

Further training and workshops scheduled for spring 2026 will give our procurement teams better understanding of the risk identification following on from the detailed supply chain mapping exercise.

5) Due Diligence

5.1) Prevention and Mitigation

As part of the Vendor Appraisal and Assessment process, new suppliers will need to demonstrate that they:

- Have a policy on Modern Slavery, which covers both their own activities and those of their suppliers.
- Implement appropriate procedures to ensure compliance with their Modern Slavery Policy.
- Produce an annual statement on Modern Slavery and Human Trafficking where the company has an annual turnover of £36m or more.
- Will accept audits of their Modern Slavery procedures as considered appropriate, by Clarke.

Where a new supplier does not meet the requirements, they must agree as a minimum to comply with the requirements of the Clarke policy and procedures in respect of Modern Slavery until such time as they have developed and implemented their own, such development being undertaken within an agreed timescale.

Having established Medium-High areas of risk, we conduct further due diligence by carrying out a detailed risk assessment through the use of a Self-Assessment Questionnaire which will be sent to these suppliers for completion, to understand whether there is evidence of Modern Slavery issues, and whether there are enough controls in place.

5.2) Supplier and Worker Engagement

We have been encouraging our suppliers to sign up with the Supply Chain Sustainability School, and steering them towards the wide range of learning and awareness resources. Video case studies of individuals with lived experience of modern slavery have helped improve understanding of how modern slavery occurs, and can be far closer to home than many people realise.

5.3) Human Rights Due Diligence Approach

Our due diligence approach to new suppliers is a two-stage process, with an initial identification of areas of potential risk including use of agency, migrant or temporary workers. This may then trigger a second stage follow up with a meeting, on-site audit, or evidence-based assessment.

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5.4) Grievance Mechanisms

Clarke has a formal grievance policy and procedure, administered by the company Human Resources department. It applies to all employees of Clarke whether permanent, on short-term or fixed-term contracts and individuals on secondment. The policy also applies to direct contract staff. If non-directly employed individuals have a grievance, they wish to formally raise then they should do this with their Employer and, if they so wish, they can make a complaint to Clarke.

There is a formal whistleblowing policy and procedure at Clarke. Normally reports are through Line Managers, HR or to the parent company, however anonymous reporting can be made via email, and anonymous feedback form on the company Intranet, or workers may use an independent service such as the [Protect](#) charity.

5.5) Incidents of Modern Slavery

No incidents of modern slavery were identified throughout Clarke's operations or supply chain.

5.6) Business Model

Clarke's business model is highly unlikely to cause, contribute or directly result in modern slavery in its operations and supply chains. Clarke only operates within the UK and the business model is to use predominantly directly-employed, directly-contracted full time workers, or subcontractors that are regularly audited by our own staff.

Our supply chain are reputable wholesalers who are able to provide end-to-end assurances from the materials they source, although this will be an area of focus for our teams in 2026 to ensure that this is indeed fully transparent and evidence-based.

5.7) Stakeholder Engagement

Our Procurement team have participated in four peer-learning one-day group sessions (Renew Aligned Procurement Forums) whereby best practice and initiatives for managing modern slavery within the supply chain are discussed and shared. The partnership with the Supply Chain Sustainability School is one such output from the Forum.

Our procurement team attended over 20 webinars in the financial year where latest developments and support channels for tackling modern slavery were shared.

5.8) Continuous Improvement

In January 2026, a dedicated role of Supply Chain Manager will be created to replace responsibilities shared amongst managers. This is in recognition of the importance of detailed risk management and due diligence throughout the supply chain.

- FY 26/27 we will become stronger2gether partners
- FY 26/27 we will appoint an MSP model to our contingent labour supply chain to add in an extra layer of protection and assurance from all the associated risks posed by this market.
- Undertaking a further review of our existing supply chain to ensure that any potential new or existing suppliers have not changed their status in terms of "risk".
- Engaging with our key strategic suppliers and industry bodies to engage with their supply chains to discuss and understand capability, best practice and learning on Modern Slavery to continuously improve our approach to Modern Slavery.

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6) Training and Awareness

6.1) Internal and External Training

All employees undertake annual Modern Slavery awareness training, delivered through the LXP Learning Experience Platform.

The objective of the course is for employees to be able to:

- State what modern day slavery is
- Recall three signs of modern day slavery
- List the ways in which to report suspicions
- Describe why there is legislation in place to protect people

Of 286 employees that were enrolled onto the "Modern Slavery 2025" programme, 279 employees successfully completed the course (98%).

100% staff involved in working with suppliers have completed their CIPS Ethics Test which provides vital up to date information on modern slavery and areas of concern and risk.

The business has retained its CIPS Ethics KITE Mark demonstrating the procedures and controls in place for ethical sourcing.

Supply Chain Mapping webinar attended by all procurement staff - Reinforced the importance of mapping as a fundamental process for identifying and assessing risks of modern slavery and other sustainability issues within supply chains. The webinar emphasised the need to understand supply chain structures across all lifecycle stages and highlighted the critical role of effective stakeholder engagement, particularly with suppliers who act as key gatekeepers to essential information. It was noted that risks may exist beyond tier 1 suppliers, often within tier 2 or tier 3, requiring a proactive and collaborative approach to risk identification and mitigation.

6.2) Training Programme Materials

The LXP training platform delivers a variety of engaging content, including videos such as real life case studies and interactive content such as quizzes to verify the users' understanding, throughout each course. The engaging content delivery model has proven to be effective in raising awareness across the whole organisation. As the course is delivered online accessed via laptops, smartphones or iPads, it is effective in reaching all staff whether home, office or field-based.

The awareness training course is updated annually to include the latest statistics and initiatives to combat modern slavery.

6.3) Training Package Development

The training packages are developed by MHR Global, who host and manage the LXP platform. They provide such training courses to over 1500 companies and have a team of researchers and training content developers. We are able to customise each course to our business, for example, linking to our Modern Slavery policy, targets, initiatives, and resources specific to Clarke.

6.4) Continuous Improvement

Mandatory Modern Slavery awareness training will be extended to all contractors from the start of the next financial year.

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7) Effectiveness of Actions

Target (2024-25 Financial Year)	Performance
All Purchasing Team to undertake refresher Modern Slavery training	100% Completed the course
100% employees complete modern day slavery awareness training	98% completed the course
50% of supply chain enrolled with Supply Chain Sustainability School	52% enrolled with the school and reporting their carbon emissions
100% staff involved in working with suppliers to undertake CIPS Ethical Purchasing training	100% Completed
Maintain Clarke's CIPS Corporate Ethics accreditation	Retained
Upload supplier list every quarter to TISC	Completed
Undertake stage 2 due diligence investigation for any potential high risk new suppliers being onboarded	No new potential high-risk suppliers were identified during the financial year.

8) Document Approval

Signed:



Ian Marshall

Managing Director

Date 5th May 2026