

Clarity Slavery and Human Trafficking Statement

Second statement

Introduction

We are Clarity, and we are a provider of travel services in the business travel sector. As defined by the UK Government, “modern slavery” includes slavery, servitude, forced and compulsory labour (including child labour amounting to modern slavery) and human trafficking.

Clarity continues to manage the risk of modern slavery in its supply chain. This is our second statement as required by the UK Modern Slavery Act 2015.

Our Policies on Slavery and Human Trafficking

We are committed to continuous improvement of our practices to combat slavery and human trafficking. On reviewing our risk of modern slavery in our operation, we have again had no reports of any incident in our supply chain (or of any human trafficking offence). We have not had to take any action (termination of contract or otherwise) against any supplier because of the findings of the modern slavery questionnaire or otherwise in relation to modern slavery in this past year.

Our Sound Sourcing Code (which we updated last year in response to the introduction of the Modern Slavery Act) embodies our commitment to conduct business with integrity, in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The code sets out requirements on human and labour rights and we aim to ensure that our suppliers understand and collaborate with the criteria in the Code.

Our Sound Sourcing Code is available to employees on our internal intranet and form an established part of how we do business.

We also have in place many other policies which support recognised human-rights principles. These include policies on non-discrimination, health and safety, whistleblowing and anti-bribery and corruption.

We will continue to ensure that we have robust systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence

We have zero tolerance to slavery and human trafficking. We require all supplier and partner organisations we work with to operate to the highest standards both internally and in managing their own supply chains and to share our values and respect for human rights.

We focussed our first supplier due diligence questionnaire on our key suppliers. This year we have revisited our targeted supplier list and as a result will be sending due diligence questionnaires to the next tier of suppliers.

Training

We have rolled out an e-learning training module to all staff to increase awareness of modern slavery risks in the supply chain. We intend to make this training an annual requirement to ensure that all staff are aware of the risks.

Our effectiveness in combating slavery and human trafficking

We will continue to use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion rates of staff undertaking the e-learning and completing end point assessment
- Use of labour monitoring and payroll systems
- Level of communication and personal contact with our supply chain and their understanding of, and compliance with, our expectations

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes slavery and human trafficking statement for the financial year ending 31st December 2017.



Pat McDonagh

CEO of Clarity
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