

Clarity Slavery and Human Trafficking Statement

Fifth Statement, January 2021

Introduction

We provide corporate travel management solutions and taking care of your business travellers is our priority. Backed by the brightest people in business travel, we combine state-of-the-art automation with exceptional customer service, attention to detail and duty of care.

This statement is published in line with section 54(1) of the Modern Slavery Act 2015 and has had full sign off by the Executive Board of Directors.

Our Commitment to the principles of the Modern Slavery Act 2015

Clarity is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

We are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our supply chain

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.

Due to the nature of our business, we assess ourselves to have a risk of modern slavery in our business and supply chains as we procure goods and services from a range of UK and international suppliers.

We work closely with suppliers, building long term relationships where we can, in order to support our focus on working conditions and quality and we have a formal escalation process in place if serious issues affecting working conditions are found within our supply chain.

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 Responsible Sourcing Code 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 policies in relation to the Modern Slavery Act 2015

We also have in place many other policies which support recognised human-rights principles. These include policies on Equality, Business Conduct Policy, Dignity at Work, Mental Health, Health and Safety, Whistleblowing and Anti-bribery and Corruption.

We will continue to ensure that we have robust policies and processes 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.

Embedding the principles

We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- making sure procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero-tolerance policy towards modern slavery

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
- Level of communication and personal contact with our supply chain and their understanding of, and compliance with, our expectations

Pat McDonagh
CEO of Clarity
January 2021