

## **Clarity Anti-Slavery and Human Trafficking Statement**

### **Seventh Statement – financial year ending 31.12.2022**

This statement sets out Clarity's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. 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.

Modern Slavery and Human Trafficking abuse the freedom and rights of an individual and go against our core values and principles. We are committed to creating and ensuring an inclusive, non-discriminatory and respectful working environment. We want all our people to feel confident that they can highlight wrongdoing without any risk to themselves.

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 Company**

We are an industry leading corporate travel management company, providing solutions and taking care of 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.

Our suite of corporate travel technology coupled with our expertise in developing bespoke solutions for our clients will guarantee optimised savings, policy adherence and resource efficiency.

This ensures our travellers get a seamless experience, where we give you the best choice of rates and fares, wherever and whenever you go.

### **Our Supply Chain**

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 services from a range of UK and international suppliers.

We have a zero-tolerance approach to modern slavery and support the UK Government's objectives to eradicate modern 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 support the government's Civil Society Strategy creating a country that works for everyone, promoting diversity, sustainability and responsible procurement. Eliminating corruption and tackling inequalities throughout our supply chain via our Sound Sourcing Code. All suppliers must adhere to this and demonstrate their modern slavery policy, gender pay reporting, and green initiatives. Issues in applying the principles must be flagged and actions documented. Some suppliers will not be found within our content when standards / policies cannot be 100% validated.

We are committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to our 'Quality Management', 'Environmental', 'Ethical Code of practice', 'Anti-Bribery' and 'Modern slavery and Human Trafficking' policies which fulfil legal and financial obligations and effectively manages commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsible (CSR) standards including but not limited to compliance with laws and



regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.

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 in relation to modern slavery in this past year.

## **Our People Policies**

During 2022 we continued to improve our business processes to support the new way of remote and hybrid working and refreshed many of our policies to reflect the fact that not everyone is face to face. We continued our regular surveys which help us to continually adapt our people strategy, proactively meet everyone's needs and support ongoing health and wellbeing.

Our recruitment process has been audited to make sure that we remain compliant with all legislation and ensure that we attract the best talent into the business. 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 also have in place many other policies which support recognised human-rights principles. These include policies on Equality, Diversity and Inclusion, Business Conduct Policy, Dignity at Work, Mental Health, Health and Safety and Anti-Bribery and Corruption.

**Annual training** – we raise awareness of modern slavery issues by ensuring annual mandatory refresher training for all our employees. We have now invested in a new Learning Management Course which has a number of new modules on this topic which we are rolling out. We are also planning a focus on Diversity, Equality, Inclusion and Belonging training.

## **2023 Plans**

This is the seventh year of reporting on modern slavery, and we continue to ensure that working conditions for all our employees far exceed the statutory minimum required by law. With over 360 dedicated and hardworking employees we believe that we consistently demonstrate our ethos of being "Brighter" and as an employer of choice.

We continue to be accredited as a Disability Confident employer and have signed the Mental Health at Work Commitment Charter and the Charter for Employers Positive about Mental Health. We also remain a Real Living Wage employer in 2022.

We are committed to continually improving and evolving to ensure that Modern Slavery and Human Trafficking is not taking place in our business or any of our supply chains.

A handwritten signature in black ink, appearing to read 'Pat McDonagh', written in a cursive style.

Pat McDonagh  
CEO of Clarity  
January 2023