

## **Policy Statement**

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.

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.

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 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.

We respect the United Nations Universal Declaration of Human Rights (<http://www.un.org/en/documents/udhr/>) and recognise our responsibility to observe those rights that apply to our performance toward our employees and the communities in which we operate.

## **Supply Chain**

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

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](http://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 subcontractor, after having obtained permission to do so from Clipfine, that they make explicitly clear to their subcontractor 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.



T. McCarron  
Chairman

Date: November 2017