

## **Modern Slavery & Human Trafficking Policy**

**Introduction:** Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CLC's Slavery and Human Trafficking Statement for the financial year ending 30th April 2019.

**Our Business:** CLC Utility Services Ltd supplies a service to the Utility industry, backfilling and Reinstating after utility services and mains works has taken place. All of our work and staffed are based in the United Kingdom.

**Our Management Systems:** Are managed by a SHEQ Manager, Accounts Director and a Work Management Centre supported by an Operations Director. The Managing Director has overall responsibility for the systems employed by CLC.

**Our Supply Chain & Partners:** Our main supply chain over this financial year includes the sourcing of raw materials principally related to the Cement and Tarmac/Asphalt industry. It also includes provision of fleet and plant. Based on our analysis and Approved Supplier Process, do not consider that our relationships with these suppliers give rise to material risks of slavery or human trafficking.

**Our Commitment:** We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Sustainable Procurement & Ethical Business Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We abhor slavery and human trafficking and will not accept such abuses in our direct operations, our indirect operations and our supply chain.

**Due Diligence Processes for Slavery and Human Trafficking:** As part of our initiative to identify and mitigate risk –

- All suppliers in our supply chain have committed to supporting CLC Utility Services Ltd, in ensuring compliance to this policy.
- We limit the geographical scope of our premises and operations to ensure optimum supervision of the use of our work sites.
- Where possible we build long standing relationships with local suppliers and clients and make clear our expectations of our business behaviour.
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in their supply chain as it is not practical for us or every other participant in the chain to have a direct relationship with all links in the supply chain in the utility sector.

**Supplier Adherence to Our Values:** We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

**Identifying Risks:** To ensure a high level of understanding of the risks of modern slavery and human trafficking, all relevant staff has been briefed on the subject.

**Customer Assurance:** CLC demonstrates its commitment through its business actions on a day to day basis. A visual assurance can be seen by clients and customers by our certifications by 3<sup>rd</sup> Party organisations such as Achilles UVDB, our ISO certifications and various other bodies.



Mr A J England  
Managing Director  
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Next Review 01/05/2020