

## Modern Slavery Policy

1. Hammond Clarke is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Hammond Clarke is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Hammond Clarke provides appropriate training and awareness information for all of its staff. In particular:

All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties Hammond Clarke are strongly encouraged to report any concerns or suspicions that they might have to Jonathan Hammond – Chairman or Tom Black MD
5. Reports surrounding these issues are taken extremely seriously by our board of directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Working with the appropriate organisations to improve standards,
  - Removing that organisation from our preferred supplier list,
  - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
  - The effectiveness of enforcement against suppliers who breach policies,
  - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
  - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
  - Corporate social responsibility policy,

The Lodge  
Cophorne Road  
Croxley Green WD3 4AQ

Telephone 0845 224 7146  
Facsimile 0845 224 7148  
info@hammond-clarke.co.uk  
[www.hammond-clarke.co.uk](http://www.hammond-clarke.co.uk)

- Ethical procurement policy,
- Anti-bribery / corruption policy, and
- Whistle-blowing policy.

This policy was adopted on 18.2.2020 after being agreed by our board of It is reviewed annually.

The Lodge  
Cophorne Road  
Croxley Green WD3 4AQ

Telephone 0845 224 7146  
Facsimile 0845 224 7148  
info@hammond-clarke.co.uk  
[www.hammond-clarke.co.uk](http://www.hammond-clarke.co.uk)