



CLANCY POLICY STATEMENT ON

Modern Slavery & Human Trafficking 2023

February 2023

Policy Statement

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Clancy's Modern Slavery and Human Trafficking Statement for the financial year ended 2nd April 2023.

At Clancy we respect human rights and do not tolerate any form of modern slavery or bullying. We recognise that every supply chain is at risk of modern slavery, and it is our responsibility to ensure that we understand these risks and work in partnership with our suppliers to mitigate them.

In addition to this statement, our Modern Slavery & Human Trafficking Policy sets out the steps taken by Clancy Group Holdings Limited and its subsidiaries (Clancy or we) to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business.

Matthew Cannon, Chief Executive Officer
February 2023



Our business

We are a national utility and construction group of companies operating across the Infrastructure Civils, Energy, Renewables, Water, Traffic Management, Plant provision and Telecom sectors with over 2,200 employees working directly for Clancy. To be able to respond and assist our clients at short notice with their workstreams, our supply chain is varied and extends to sub-contractors who provide a service to Clancy, where we pay particular attention to the risk of modern slavery.

To conduct our business effectively we rely on a number of manufacturers, suppliers, and distributors which, in turn, will source products from their respective supply chains.

Our customers also take their responsibilities very seriously and we are required to meet their supplier codes of conduct and to confirm that Clancy is meeting its obligations under the Modern Slavery Act 2015.



Our approach

Given our predominantly direct employment model, there is less risk of modern slavery in our own business than through our supply chain. To prevent modern slavery and human trafficking however, we have implemented the following preventative measures:

- we are members of the UK Government's Home Office Gangmasters and Labour Abuse Authority ("GLAA") and are signatories to the Construction Industry protocol;
- our established Security and Investigations department with law enforcement experience who have contacts with both the GLAA investigations team and the Home Office CITS forum;
- arranged a series of GLAA workshops for our clients and colleagues within the Construction industry to highlight the potential of inadvertently engaging with businesses who are non-compliant with modern slavery legislation;
- CCTV or GPS vehicle tracking is used to ensure the safety and security of our employees that allows us to monitor for evidence of modern slavery or other inappropriate behaviour;



- employee engagement: we review and continue to communicate our Modern Slavery & Human Trafficking Policy by providing periodic reminders to our employees to ensure that they are vigilant to potential threats.
- HR due diligence: Right to Work Checks: As part of our onboarding process for new employees, we carry out right to work passport checks in accordance with Government requirements; and
- we also review bank account details supplied to ensure that they correspond with the name of the employee and that any discrepancies are fully investigated, including any instances of multiple salaries being paid into a single bank account.

Our supply chain standards

Clancy are unusual within the construction industry in that our business has a high percentage of direct employees as opposed to relying predominantly on a subcontractors which allows us the benefit of a high level of oversight of our workforce and of our procedures. Where subcontractors and suppliers are used however, these individuals and/or organisations are required to confirm the actions that they are taking to ensure labour exploitation, modern slavery and human trafficking are not taking place in any part of their business or supply chain. We continue to work to increase visibility of supply chains operations outside the UK.

Subcontractors are challenged when first obtaining 'Approved Supplier' status, and throughout 2022/2023 they have been audited by our Procurement Department to ensure that these standards are maintained throughout their partnership with our business.

We expect our suppliers to:

- ensure that employees are engaged under fair terms with reasonable pay and for all employees to have a written contract of employment;
- prohibit any type of harassment including physical or verbal abuse, threats, and bullying;

(continued...)

Our supply chain standards (continued)

- ensure employees working hours comply with national laws and industry specific regulations;
- prohibit forced, bonded or compulsory labour so that employees are free to leave their employment after reasonable notice;
- ensure that there is no worker requirement to lodge deposits or identity papers, and that no person has had to pay any direct or indirect fees to obtain work;
- allow all employees freedom to join, or not to join an employee representative body;
- ensure that health and safety and environmental risks are identified, minimised, managed; and
- meet the Minimum Standard for Labour Providers to tackle modern slavery.



Training

Training on modern slavery and on the risk that we face from modern slavery in our supply chains forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

The Board of Directors have been fully briefed on the risks of modern slavery and we continue to conduct internal training on our approach to compliance with the Modern Slavery Act by delivering awareness training on issues of modern slavery and other topics of concern and/ or interest via our e-learning platform.

Our Modern Slavery & Human Trafficking Policy informs all employees about the Modern Slavery Act, the warning signs to look out for and how to raise any concerns, internally, by using the Modern Slavery helpline **0800 012 1700** or the Whistleblowing service details of which are on the next page.



How to raise your concerns



At Clancy, we will always empower our workforce to do the right thing. We are committed to making it safe and easy for those working with and for us to voice concerns and to embed a culture where everyone feels confident raising those concerns without fear of reprisal.

Our independent confidential whistleblowing service, SeeHearSpeakUp enables our employees and third parties including supply chain partners, or members of the public to report concerns about modern slavery

or any other potentially unlawful/unethical behaviour. There have been no reports of any modern slavery issues at Clancy raised within the business, or via the SeeHearSpeakUp whistleblowing service in the period covered by this statement.

You can raise concerns to **SeeHearSpeakUp** by phone: **0800 988 6818** or by email: **report@seehearspeakup.co.uk**. When emailing please state **Clancy** in the subject header.

Next steps



At Clancy, we put our employees and suppliers at the core of our success. We will continue to train our employees to be alert to the risk of modern slavery and raise awareness of the warning signs. We plan to raise awareness further in the next 12 months in the following ways:



Our Supply Chain

Continue to review our pre-qualification standards for the appointment of new suppliers/subcontractors. A further series of modern slavery and labour exploitation audits will take place in 2023;



Our Policies

Our Policies: Ongoing reviews and updates to our Modern Slavery & Human Trafficking Policy (and related policies) to ensure that our workforce understand that we are committed to acting ethically and with integrity;




Regular reviews

Continue to assess the risks of modern slavery and human trafficking in our business and our supply chain and review systemic risks from audit findings and in response actioning as appropriate.



Employee Awareness

Issuing updated and comprehensive modern slavery training across our business for all 2,200 employees. This will include a companywide communications campaign setting out the key indicators alongside the training; and



All of our current policies are available to read here:

www.theclancygroup.co.uk/our-company/our-policies/