
Modern Slavery Policy

May 2026

Version No	Date Issued	Update Details	Owner	Approved By	Policy Number
v4.0	January 2022	Policy in previous format	Company Secretary	The Board	CG1-POL-024
v5.0	January 2023	Policy finalised following major revision and review of February 2022 policy, amendments and change of format.	Company Secretary	The Board	CG1-POL-024
v5.1	January 2024	Annual review of policy	Company Secretary	The Board	POL-024
v5.2	May 2025	Annual review of policy. Changes made to details of Whistleblowing Provider.	Company Secretary	The Board	POL-024
v5.3	May 2026	Annual review of policy with amendments made to pages 1, 2 and 4(how to raise concerns).	Company Secretary	The Board	POL-024

Modern Slavery Policy

This policy sets out the steps taken by Clancy Group Holdings Limited and its subsidiaries (Clancy, our, or we) to help ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. We recognise that all organisations face the risk of modern slavery. It is our responsibility to understand the risks relevant to our operations and supply chains, and to work with our suppliers and business partners to prevent and mitigate them.

This policy is intended to help all of us recognise and respond to the harm that modern slavery and human trafficking can cause. We are committed to acting ethically with integrity and responsibly in all our business dealings and relationships and we have **zero tolerance of modern slavery and human trafficking in any part of our business or supply chains.**

Policy

This policy sets out our responsibilities and of those working for us in observing and upholding our position on modern slavery and human trafficking. It also provides information and guidance to colleagues, individuals and businesses working with us or for us, to help them recognise and respond to modern slavery and human trafficking risks.

We are committed to 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 our contractors, suppliers and other business partners.

This policy is reviewed annually by the Company Secretary and will be monitored for compliance by Line Managers/Supervisors within their own area of responsibility. If you have any questions or concerns at any time around any matters covered, or possibly covered by this policy, speak to your manager or if you prefer, to the Company Secretary (in confidence).

This policy does not form part of any contract of employment, and we may amend it at any time.

Who is required to comply with this policy?

This policy applies to all employees working for Clancy at all levels and applies to consultants, seconded employees, agency workers, agents, or any other person associated with Clancy, (referred to as “you” in this policy).

What is modern slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms including slavery, servitude, forced or compulsory labour and human trafficking which all involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Modern slavery can occur in any sector but is not always easily visible. By its very nature it is hidden in plain

sight and, because our work frequently takes place in the construction and utility sectors (including on projects and schemes that are not controlled by us), the risk of modern slavery within the industry remains significant.

Modern slavery takes many forms. The most common that apply to the workplace are:

- **Forced labour:** Any work or services people are forced to do against their will under threat of punishment;
- **Debt bondage/bonded labour:** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their working conditions and the debt itself; and
- **Human trafficking:** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them.

Within our contracting processes, we prohibit the use of forced, compulsory or trafficked labour, and the use of any person held in slavery or servitude, whether adults or children. We require our suppliers to apply the same standards throughout their own supply chain to the same standards.

Our approach

We maintain specific policies in relation to employment to prevent slavery and human trafficking and to ensure that any risks are mitigated. Refer to our Modern Slavery Policy Statement for details on the approaches that we have taken to combat modern slavery and human trafficking.

Our supply chain standards

Where we use subcontractors and suppliers, these organisations must confirm the steps that they take to help ensure that labour exploitation, modern slavery and human trafficking are not taking place in any part of their business or supply chain.

Compliance with this policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. You must adhere to the following:

- avoid any activity that might be considered to engage with, or suggest, a breach of this policy;
- notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the foreseeable future;
- raise concerns about any issue or suspicion of modern slavery in any parts of our business or subsidiaries at the earliest possible stage; and
- If you believe or suspect that a breach of this policy has occurred or that it may occur in the foreseeable future; notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.



If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any part of our business constitutes any of the various forms of modern slavery; we encourage you to raise your concerns through our independent whistleblowing service **AAB People**, details of which are below.

Training and communication

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

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

How to raise your concerns

If you believe that Clancy or an individual has acted or may be acting in violation of this policy, we want you to raise your concern immediately.

You can raise issues by either contacting the Company Secretary (details of which are below) or through our independently run whistleblowing service: **AAB People**.

David Pegg
Company Secretary
Email: David.Pegg@theclancygroup.co.uk
Tel: 01895 829737

Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

AAB People whistleblowing reporting service

AAB People (formerly known as SeeHearSpeakUp) is an anonymous independent whistleblowing service for our employees, suppliers and third parties in the supply chain or members of the public to report any concerns or seek advice on any matter related to compliance with the law, modern slavery and any other human rights violations in our business or supply chains.

Concerns can be reported AAB People reporting channels (including live telephone reporting, secure web portal or email, which are accessible 24 hours a day, 365 days a year and are detailed below. We will endeavour to maintain confidentiality in respect of all concerns raised and reports can be made anonymously if preferred.

You can raise concerns to **AAB People (formerly known as SeeHearSpeakUp)** by any of the following channels:

BY PHONE: Call **0800 988 6818**. This confidential reporting hotline operates 365 days per year, 24 hours per day. All handlers are professionally trained.

ONLINE PORTAL: You can report online via the website at www.seehearspeakup.co.uk/login. You will need a username and password to login. These are as follows:

USERNAME: Clancy **PASSWORD:** C6429

BY EMAIL: You can email any concerns to AAB People at: report@aabpeople.global. When emailing please state Clancy in the subject header.

Protection

Individuals who raise concerns or report another's wrongdoing are sometimes worried about repercussions. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any of these treatments, you should inform the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy which is available on the intranet, One Clancy.

Breaches of this policy

If you breach this policy, you will face disciplinary action which could result in dismissal for misconduct or gross misconduct in accordance with our Disciplinary Policy. In addition, we may refer the matter to law enforcement bodies where warranted. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy and if necessary, report the matter to the Gangmasters and Labour Abuse Authority.