



Clancy Group Holdings Limited

Policy statement

Modern slavery & human trafficking 2026

Trusted to deliver smarter, greener infrastructure



1. 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 31st March 2026.

At Clancy, we respect human rights and do not tolerate any form of modern slavery. We recognise that supply chains can be exposed to risks of modern slavery, and it is our responsibility to 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
May 2026



2. 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 respond to client requirements at short notice, we rely on a varied supply chain including sub-contractors and other third party providers. We therefore pay particular attention to the risk of modern slavery within our supply chain.

To conduct our business effectively, we rely on a range of manufacturers, suppliers, and distributors who, in turn, will source and materials products from their own supply chains.

Our customers also take their responsibilities seriously and are required to meet their supplier codes of conduct.



» 3. 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 signatories to the UK Government's Home Office Gangmasters and Labour Abuse Authority ("GLAA") Construction Industry protocol.
- We have an established Security and Investigations department who regularly engage with the GLAA Investigations Team and we currently chair the CITS forum that is supported by the Home Office.
- 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.
- As part of our onboarding process for new employees, we carry out right to work passport checks in accordance with Government requirements.
- 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.

- Ethical procurement requirements are now a standard part of all competitive tenders.
- Supplier contracts have been updated to include stronger audit rights for Clancy and strengthened the requirement for "imposter" checks for Right to Work (RTW) verifications, helping to reduce the risk of identity fraud and coercion.



» 4. Our supply chain standards

Clancy is unusual within the construction industry as we have a high percentage of direct employees, rather than relying predominantly on subcontractors. This provides us with a high level of oversight of our workforce and operational procedures. Where subcontractors and suppliers are engaged, these individuals and/or organisations are required to confirm the measures they have in place to prevent labour exploitation, modern slavery and human trafficking within their business operations or supply chains.

Over the past 12 months our business has grown quickly, moving into new workstreams and significantly expanding our supply chain. As a result, we have focused on implementing robust, scalable due diligence processes to support effective oversight and ongoing compliance across our operations and supply chain. We continue to work to increase visibility of supply chain operations outside the UK.

Throughout 2026/2027, subcontractors engaged by the business will be subject to ongoing reviews and compliance checks to ensure that required ethical, labour, modern slavery, cyber security, and anti-bribery standards are

maintained throughout their engagement. We have concentrated on risk profiling and pre-qualifying our growing supplier base. This has allowed us to take a more targeted and practical approach, focusing our efforts where the risks are highest.



» 4. Our supply chain standards continued

- Prohibit any type of harassment including physical or verbal abuse, threats, and bullying.
- 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.
- Meet the minimum standard for labour providers to tackle modern slavery.

» 5. 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.

» 6. How to raise concerns

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, AAB People (formerly known as 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 or unethical behaviour. There have been no reports of any modern slavery issues at Clancy raised within the business or via the AAB whistleblowing service in the period covered by this statement.

You can raise concerns to AAB by:

Phone: 0800 988 6818

Email: report@aabpeople.global

When emailing please state Clancy in the subject header.



7. 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:



01 Our supply chain

Continuing to review our pre-qualification standards for the appointment of new suppliers/ subcontractors. Using our new risk profiles, we will focus any future site-based audits on higher-risk workstreams to ensure that our standards continue to be met across all supply chain relationships.



02 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.



03 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.



04 Regular reviews

Continuing 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.



Scan the code to view all of our current policies or click on the link below:

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