

As Employment Businesses and Service Providers, Clan Partners Ltd and our Subsidiary organisations maintain relationships with many different organisations within our supply chain, as well as supplying varying levels and numbers of contract, interim, temporary, and permanent workers.

CORE VALUES

Clan Partners & Subsidiaries have adopted a statement of our Corporate Values on the prevention of Modern Slavery and Human Trafficking. This value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

- We expect all or who have, or seek to have, a business relationship with Clan Partners & Subsidiaries and/or any member of our organisations, to familiarise themselves with, and act at all times in a way which is consistent with, our anti-slavery stance.
- We are committed to opposing Modern Slavery and Human Trafficking in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.
- We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery and Human Trafficking is not taking place anywhere in our own business or those of our suppliers.
- We are committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery and Human Trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

RESPONSIBILITIES

The Senior Management of Clan Partners and the Subsidiary Managing Directors have overall responsibility for:-

- Prevention of Modern Slavery and Human Trafficking
- ensuring this policy and its implementation complies with our legal and ethical obligations.
- Adequate and regular training is provided on the issue of Modern Slavery & Human Trafficking.

Line Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

All Employees have an obligation to familiarise themselves with our policy to help in the identification and prevention of Modern Slavery and Human Trafficking and to conduct business in a manner such that the opportunity for and incidence is prevented. Adherence to this policy forms part of all Employees obligations under their contract of employment.

REPORTING

Please refer to the Whistleblowing policy statement for full details on how concerns are to be communicated to Clan Partners. In summary, a team member should approach a Line Manager with the nature of the complaint who will determine Clan Partners next course of action. This reporting method can be used in any of the following circumstances: -

- You suspect a person acting on behalf of Clan Partners & Subsidiaries is seeking to exploit another in a way which could amount to Modern Slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to Modern Slavery;
- You have received an approach from a person acting on behalf of Clan Partners & Subsidiaries who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of Clan Partners & Subsidiaries or suppliers is preparing to commit, is committing, or has committed an act in contravention of the Modern Slavery Act 2015.

The source of reports via this method will be kept confidential, subject to the need for Clan Partners to act responsibly and within the law. Confidential records of these reports will also be held within the permissions of the law.

Clan Partners & Subsidiaries encourages members of the public or people not employed by us to email in confidence, to Senior Management via info@clan-partners.com to raise any concern, issue or suspicion of Modern Slavery in any part of our business or related supply chain.

DUE DILIGENCE

We undertake due diligence when considering taking on new suppliers by means of supplier evaluation questionnaires, and regularly review our existing suppliers. The level of due diligence undertaken is assessed on a case by case basis of suppliers.

SAFEGUARDS

Clan Partners & Subsidiaries 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 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 own business or in any of our supply chains.

Anonymous concerns can be reported via the [QHSE Suggestion Box](#). These will be accepted and taken seriously however, individuals are encouraged to put their names to concerns as this makes investigation and validation easier and the process more effective. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

This policy applies to all Workers, Subcontractors, Visitors and Other Relevant Persons of Clan Partners and subsidiaries, and shall be communicated to them, and made available as required to those who request it. This Policy is available to all relevant interested parties and shall be supplied to them upon reasonable request. This Policy shall be reviewed annually by Senior Management and, where necessary, will be amended and re-issued.



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Clan Partners



Cheryl Nicolson
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