Scope of Policy

This policy applies to Clarity Environmental Limited and to all persons working for or on its behalf in any capacity, including directors, officers, employees at all levels, agency and temporary workers, secondees, volunteers, interns, agents, contractors, consultants, suppliers and other business partners. It applies to our own operations and to all tiers of our supply chains. Everyone within scope must read, understand and comply with this policy.

Modern Slavery and Human Trafficking

Modern slavery includes slavery, servitude, forced or compulsory labour, debt bondage, the worst forms of child labour and human trafficking. Human trafficking involves arranging or facilitating a person's travel with a view to exploitation. Modern slavery is a crime and a serious violation of fundamental human rights. Indicators may include restriction of movement, retention of identity documents, threats, coercion, excessive recruitment fees, withholding of wages or abuse of vulnerability.

Organisation Structure

Clarity Environmental Limited provides environmental compliance, recycling and waste-management solutions. Our supply chains include providers of waste and recycling services, transport and logistics, labour, facilities, professional services, technology, equipment and other goods and services used in our operations. We will assess modern-slavery risk by reference to factors such as geography, sector, labour model, recruitment practices, use of subcontracting and the nature and value of the goods or services supplied.

Our Commitment

We are committed to preventing modern slavery and human trafficking in our operations and supply chains, respecting internationally recognised human rights, complying with applicable law, and continually improving our controls.

We will take a risk-based and proportionate approach consistent with effective compliance management, sustainable procurement principles and responsible business practices, including accountability, transparency, respect for human rights, due diligence, competence, monitoring and corrective action.

We prohibit modern slavery in all forms. We will not knowingly engage with any person or organisation involved in modern slavery. Where a concern is identified, our priority will be the safety and interests of affected people; we will investigate, cooperate with appropriate authorities and specialist organisations where necessary, and seek effective remediation rather than taking action that could increase harm.

Clarity Environmental Limited will establish, monitor and review appropriate objectives and performance measures relating to ethical sourcing, supplier due diligence and modern slavery prevention as part of its wider management system framework.

Responsibilities, Risk Assessment and Due Diligence

The Board has overall responsibility for this policy. The Chief Executive Officer is accountable for its implementation, supported by managers responsible for procurement, people, compliance and operational delivery. We expect suppliers and business partners to comply with applicable modern-slavery laws, this policy and equivalent standards in their own supply chains. Suppliers may be required to provide information, policies, declarations or other reasonable evidence demonstrating compliance with modern-slavery legislation and the principles contained in this policy.

Our proportionate, risk-based controls include:

- identifying and periodically reassessing modern-slavery risks in our operations and supply chains, with enhanced due diligence for higher-risk suppliers, sectors, locations and labour models.
- considering modern-slavery risk when selecting, onboarding, renewing and monitoring suppliers, including proportionate questionnaires, evidence checks, contractual requirements, audit rights and corrective-action plans.
- requiring suppliers to prohibit forced, bonded and child labour; avoid worker-paid recruitment fees; respect freedom of movement; and maintain lawful employment, pay and working practices.
- maintaining appropriate checks that workers have the right to work and receive at least the applicable statutory minimum pay, without retaining original identity documents except where lawful, necessary and voluntarily agreed.

- providing relevant employees with proportionate training on risk indicators, procurement controls, escalation and response, and periodically reviewing training completion and effectiveness.
- recording due-diligence decisions, reported concerns, investigations, actions and outcomes so that control effectiveness can be reviewed; and
- reviewing supplier performance and taking proportionate action, which may include improvement plans, suspension or termination where issues are not remedied.
- Supplier contracts will, where proportionate to risk, contain modern-slavery provisions requiring compliance, prompt notification of concerns, cooperation with enquiries, flow-down to subcontractors and appropriate remedies for breach.
- Procurement and contract owners will monitor compliance using proportionate evidence, reviews or audits and will escalate material concerns to the Chief Executive Officer.

Concerns should be raised promptly with a line manager, the Chief Executive Officer or through the Company's whistleblowing arrangements. Employees, agency workers, contractors, suppliers and other stakeholders are encouraged to raise concerns in good faith without fear of retaliation. We will protect confidentiality as far as reasonably possible, assess immediate safeguarding needs, preserve relevant information, investigate proportionately and document decisions. No one should confront a suspected perpetrator or take action that might place an affected person at greater risk. Where appropriate, we will seek specialist advice and report matters to law-enforcement or other competent authorities.

Where section 54 of the Modern Slavery Act 2015 applies, the Company will prepare a slavery and human trafficking statement for each financial year describing the steps taken during that year. The statement will address, as appropriate, the organisation and its supply chains, relevant policies, due-diligence processes, principal risk areas and risk-management steps, effectiveness measures, and staff training.

Any statement required under section 54 will be approved by the Board, signed by a director, published on the Company website with a prominent homepage link, and published as soon as reasonably practicable after the financial year end. The Company will consider adding the statement to the UK Government modern slavery

statement registry. This policy does not replace the annual statement where the statutory duty applies.

Monitoring, Records and Review

We will monitor and periodically review the effectiveness of this policy and associated controls using proportionate measures, such as completion of risk assessments and training, supplier due-diligence coverage, concerns raised, response times, corrective actions, evidence of remediation and, where appropriate, internal audits and management reviews.

Relevant records will be retained in accordance with applicable legal, contractual and information-governance requirements. This policy will be reviewed at least annually and sooner following a material incident, significant legal or organisational change, or identified control weakness. Findings from monitoring activities will be reviewed by management and used to support continual improvement of modern-slavery prevention controls.

This policy will be communicated to all staff and made available to relevant interested parties through our website at **https://clarity.eco/**. Questions about this policy or its application should be directed to the Chief Executive Officer.



Natalie Rea

CEO

Clarity Environmental