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## **Modern Slavery Act Statement for the financial year 2019/2020**

### **Introduction**

This statement, which has been approved by the Board of Directors, is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 ("the Act") and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Slavery and human trafficking is a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our colleagues are expected to report concerns and management are expected to act upon them.

### **Our Business**

Clarke International Limited is a wholesaler of Power Tools and Machinery.

### **Our Supply Chains**

We source our products from suppliers in a number of countries. In all of its dealings with these suppliers, Clarke International Ltd strives to ensure that the highest ethical standards are met. As part of this ongoing obligation, we have conducted an audit on our suppliers by asking them to confirm that there will be an increased focus by them to eradicate any slavery and human trafficking in their own businesses and their supply chain and asking them to confirm that they, in turn have conducted an audit on their immediate supply chain.

### **Our Policies on Slavery & Human Trafficking**

Clarke International Limited is committed to supporting international efforts to promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking as defined in the Modern Day Slavery Act 2015.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

### **Due Diligence Process for Slavery & Human Trafficking**

As part of our initiative to identify and mitigate risk we:



- Where possible, build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- With regards to international supply chains, our point of contact is preferably with a UK company or agent and we expect these entities to have suitable antislavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

As part of our commitment Clarke International Limited has requested (and will continue to request):

- Written undertakings from all suppliers in order to satisfy itself of their ongoing ability to comply with the Act both in regards to their own activities, and also that of their supply chain.
- We have also updated our Terms and Conditions of trading for any new suppliers to ensure their relevance and compliance with the Act.

### **Training**


Our training programme for buyers has been updated to include their understanding of how suppliers can meet their compliance with the Act and how they can play an active part in evaluating and monitoring, in order to mitigate the risks within the supply chain.

We have also trained our key staff in Modern Slavery and human rights and then used them to support each business area in meeting their obligations of the Modern Slavery Act.

### **Effectiveness in Combating Slavery & Human Trafficking**

As part of their discussions and negotiations with current and potential suppliers, our buyers will in future ask questions of each supplier to ensure they are compliant or confirm what steps are being taken to ensure compliance with the Act by that supplier and further down their own supply chains.

Where required, further audits or documentary evidence will be requested from certain suppliers to ensure that they are compliant with the Act.



John A. Clarke

For and on behalf of the Board of Directors