

Cleardata UK Ltd

MODERN SLAVERY POLICY & STATEMENT

It is the responsibility of all Cleardata employees to read and understand this policy. This policy may be updated periodically in line with applicable legal and regulatory changes.

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1. Purpose

Cleardata UK Ltd is committed to ensuring that modern slavery and human trafficking are not present in its business operation or supply chains.

This policy sets out how we will prevent, detect and deal with modern slavery, in line with the Modern Slavery Act 2015.

2. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3. Our Commitment

- We uphold the principles of the Modern Slavery Act 2015;
- We operate a zero-tolerance approach to modern slavery;
- We are committed to transparency and to implementing effective systems and controls to ensure modern slavery is not taking place in our operations or supply chains.

4. Policy Statement

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

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 is not taking place anywhere in our own business or in any of our supply chain.

We are also committed to ensuring there is 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 of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

5. Organisational structure

Cleardata UK Ltd is a UK-based document management and digital services company that helps transform the way data is managed within their business. Specialising across the digital document management spectrum, Cleardata offers 'one stop shop' services including archiving, digital transformation combined with intelligent document and data automation, hosting and shredding to customers.

With over 160 staff, Cleardata operates across a number of sites at the following locations:

- Innovation House, Coniston Court, Blyth
- Inspiration House, Ennerdale Road, Blyth
- The Enterprise, Hawarden Business Park, Flintshire
- Unit 7 Pacific Park, Bridge Road North, Wrexham LL13 9PN

This policy also applies to Cleardata Limited and Cleardata Holdco Ltd..

6. Policies in relation to modern slavery and human trafficking

The following policies are available to all staff through our HR System:

- Employee Code of Conduct
- Equality and Diversity Policy
- Sexual Harassment, Harassment and Bullying Policy
- Whistleblowing Policy
- Corporate and Social Responsibility Policy

7. Our Supply chain

We recognise that the way we procure goods and services plays a crucial role in preventing modern slavery and human trafficking. To ensure compliance with The Modern Slavery Act 2015, we have embedded ethical and responsible practices into our procurement and processes. This includes:

- **Risk based supplier due diligence** - We conduct appropriate due diligence checks on suppliers and contractors to assess risk and require them to comply with the Modern Slavery Act as part of our Supplier Code of Practice and contractual obligations. This includes that they do not, and will not, engage in any practice involving forced labour, servitude or human trafficking. High risk suppliers may require more rigorous checks and audits.

Where risks are identified, we will take steps to mitigate them and, if necessary, terminate relationships with non-compliant stakeholders.

8. Responsibilities

- **Cleardata Board:** the board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those

under our control comply with it. This includes monitoring the effectiveness of the policy through key measures.

- **The Director of Governance and Compliance** has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- **Management at all levels** are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- **Employees** are expected to report any concerns relating to modern slavery and trafficking.

9. Training and Awareness

We provide training to staff at induction and annually thereafter to help them recognise signs of modern slavery and trafficking and ensure they understand how to report concerns.

10. Reporting Concerns

Employees, suppliers or third parties can raise concerns confidentially via our whistle blowing procedures or directly with the Director of Governance and Compliance. All reports will be investigated thoroughly and acted upon appropriately.

Employees and third parties are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Director of Governance and Compliance.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith 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.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the employee handbook.

11. Monitoring the effectiveness of this policy

Cleardata assesses the effectiveness of its actions to combat modern slavery and human trafficking through several key measures: supplier compliance checks, staff training completion rates, and the monitoring of whistleblowing and compliance reports. We track key indicators such as:

- The number of new suppliers that have passed due diligence specific to modern slavery
- The number of key suppliers that have signed up to Cleardata's Supply Chain Code of Conduct
- The number of non-compliance issues or whistleblowing reports relating to modern slavery identified and resolved
- The number of staff who can completed and passed their annual training

These are monitored through our Management Review Group and Board.

12. Non compliance with this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

13. Review and continuous improvement

This policy will be reviewed annually and updated to reflect changes in legislation, regulation, to reflect evolving risk or industry best practices.

Current version number	Last date of review	Reviewed by	Changes made
v1.0	01062020	Head of Governance	Policy creation
v1.0	01062021	Head of Governance	Policy review
v1.1	30082022	Director of Governance & Compliance	Review and job title changes
v1.2	07112023	Director of Governance & Compliance	Review no change
v1.3	17092024	Director of Governance & Compliance	Review - to update further when Supplier Charter is introduced
v1.4	01092025	Director of Governance & Compliance	Rebranding Aligned to the supplier COP and rewrite of policy
v1.5	24092025	Director of Governance & Compliance	Updated to include company details and performance measurements.