

Modern Slavery and Human Trafficking Statement

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1. About this document

1.1. Document Control

Version	Author	Date	Purpose/Change
2.0	Brendan O'Halloran	29/03/2021	Initial Draft
2.0	Brendan O'Halloran	13/12/2022	Annual Review
2.0	Brendan O'Halloran	08/01/2024	Annual Review

1.2. Document Purpose

This document sets out how Claranet Group Limited and Claranet Limited ("Claranet") complies with s.54, Part 6 of the Modern Slavery Act 2015 ("the Act").

2. Introduction

Claranet is a leading managed IT service provider with a growing global footprint built on our original foundation: local service delivered by local teams, using a mixture of local and international infrastructure.

Claranet adheres to the letter and spirit of all applicable legislation. Further, it is the policy of the Claranet to conduct its business in line with the highest ethical standards.

Claranet is committed to combatting slavery and human trafficking and to acting with integrity in all of our relationships. We have a zero-tolerance approach to human rights abuses as dealt with under the Act, in both our organisation and our supply chains. We are aware that as an employer, and as a part of each of the communities in which our sites are located, it is critical that we tackle and address the issue of human rights abuses in line with increasing global focus in this area.

3. Claranet structure

Claranet, its subsidiaries and affiliated companies operate in the United Kingdom, France, Portugal, Italy, Germany, Switzerland, The Netherlands, Spain, United States and Brazil and provides services to clients in these and many other countries. Due to the nature of our services, our supply chain is complex and our network of suppliers is extensive.

As a business we are committed to acting responsibly and supporting the objectives of the Act. We have established a Modern Slavery and Human Trafficking Policy to embed this commitment. We aim to review our standard procurement and contractual documentation to enable us to strengthen our position in relation to these matters. We endeavour to implement certain systems and controls aimed at ensuring modern slavery is not taking place anywhere within our or in our supply chains. We aim to communicate to our suppliers our expectations they will hold themselves to similar standards and show progress and compliance in this area. These aims are set out below:

3.1. Due Diligence

We carry out detailed due diligence prior to on boarding a new strategic supplier. We are broadening this process with expanded investigations where required. We aim to establish what form these investigations may take based on what is suitable for the assessed risk profile of the individual supplier. We seek to maintain a zero tolerance approach in relation to failings around human rights abuses which may become evident during the due diligence process.

3.2. Policies

To support our compliance and strength in this area, we strive to have in force:

- a supplier code of conduct and
- a Modern Slavery Policy and Human Trafficking Policy;

alongside existing policies in force as support to the spirit and aims of the Act

- equal opportunities policy and
- recruitment policy.

3.3. Risk Assessment: Audit

We aim to undertake risk assessments in relation to certain key suppliers to better understand any perceived risk level in a given relationship. We further aim to bolster our auditing rights and abilities to better satisfy ourselves as to the practices and procedures of our suppliers.

3.4. Contractual Remedies

We endeavour to introduce contractual rights and remedies into certain strategic supplier relationships in order to strengthen and support our compliance with and endorsement of the Act's aims.

3.5. Training

We are committed to ensuring that Claranet personnel are equipped to understand the implications of possible human rights abuses as dealt with under the Act, whether in our business or our supply chains, and to identify risk factors and escalate appropriately. To maintain awareness and ensure a high level of understanding of the risk of modern slavery and human trafficking in our business, our statement and policy is included in our employee handbook.

We aim to provide training and ongoing updates through inductions, internal training and policy documentation to:

- Senior leadership team;
- All staff
- Dedicated sourcing and procurement colleagues;
- Subject matter experts holding key relationships with our supply base.

3.6. Senior Sponsorship

Claranet aims to establish a corporate responsibility board including members of staff with responsibility for supply chain and people compliance. This board is responsible for drafting and rolling out a corporate strategy in relation to our compliance with and support of the Act.

Our executive leaders are determined to run our business responsibly and to implement procedures and policies to tackle human rights abuses in this area.

Signed by and on behalf Claranet Group Limited and Claranet Limited
Chief Financial Officer and Director Claranet Group Limited and Claranet Limited



Nigel Fairhurst