

**P00520-HR-MTR REV A**  
**Modern Slavery Policy**

ClearView Communications places a high value on people and are committed to opposing modern slavery in all of its formats and works towards preventing it whenever we can.

It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. ClearView Communications will not tolerate modern slavery and are committed to acting with integrity in all business transactions.

**Purpose**

This document sets out the Modern Slavery policy of ClearView Communications and is communicated to all employees of ClearView Communications and, if appropriate, made available to interested parties.

Under the Modern Slavery Act 2015, it is a criminal offence in all of its forms such as, forced or compulsory labour, human trafficking and servitude which deprives a person's liberty by another in order to exploit them for their own personal or commercial gain.

This policy sets out ClearView Communications aims in the prevention of opportunities for modern slavery to occur within our own business and that of our suppliers.

**Procedure**

To ensure compliance with the act the following measures when appropriate are undertaken

**People Policies**

All employees inclusive of contractors or sub-contractors will adopt the Modern Slavery policy and related procedures.

All employees are expected to co-operate to the fullest extent possible in any investigation into suspected breaches of the policy or any related process or procedure and are required to avoid any activity that might lead to, or suggest, a breach of the policy and are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the organisation or supply chains at the earliest possible stage.

Any violation or disregards for the commitment and responsibilities within this policy will be taken seriously and dealt with through either supply chain management procedures or ClearView Communications disciplinary procedure.

The policy or any related process or procedure if breached by an employee may be regarded as Gross Misconduct and may lead to an immediate dismissal further to our disciplinary procedures.

## **Vetting procedures**

As part of the recruitment process all employees undertake an enhanced DBS which includes the right to work in the UK check, in addition employees are Police Security Clearance Screened.

## **Salary and Benefits (direct employees)**

Salaries are made at regular intervals and directly to employees. Any non-direct payments are raised and discussed with HR. Only deductions, advances or loans authorised by national law are permitted with the full consent of the employee. Clear and transparent information is provided to employees about hours worked, rates of pay.

## **Training**

Training on the policy, and on the risks ClearView Communications faces from Modern Slavery in its supply chains, forms part of our induction process for all employees. Regular training will be provided as necessary

## **Third Party Suppliers**

Our approach to Modern Slavery is communicated to all suppliers, contractors and sub-contractors and forms part of our contract with them and they are required as part of our selection process that they comply with the Modern Day Slavery Act 2015.

## **Reviews**

The policy, along with any related process and procedures are reviewed on an annual basis and training provided accordingly.

## **Key Performance Indicators**

We have not identified any instances or indications that either slavery, or human trafficking occurs in our supply chain; or on this basis we currently do not consider it necessary to adopt any formal performance indicators to measure the effectiveness of the policy, process or procedure.

Signed:



Michael Vincent, Managing Director

23.11.2020