

Anti-slavery and human trafficking policy

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Anti-Slavery International, a UK based charity, report that 40 million people are estimated to be trapped in modern slavery across the globe, with over 10,000 people identified as potential victims in the UK in 2019.

Clipstone is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation, particularly on the estates we own and manage, or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Policy Statement

We expect everyone working with us or on our behalf to support and uphold this policy to safeguard against modern slavery. We have a zero-tolerance approach to modern slavery in our organisation or our supply chains.

The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy. We are committed to having a clear and transparent company statement, which is reviewed regularly and is communicated to our employees posted on our website, which sets out the steps taken to prevent modern slavery and trafficking and the effectiveness of those measures.

As part of our contracting processes, we will include a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with our Modern Slavery and Labour Standards Supplier Code, which sets out the minimum standards required to combat modern slavery and trafficking. Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Modern Slavery and Labour Standards Supplier Code. Suppliers engaging workers through a third party are also expected to obtain third parties' agreement to adhere to the Modern Slavery and Labour Standards Supplier Code.

Policy Application

This policy applies to all those working for Clipstone or on our behalf in any capacity, including employees at all levels, directors, officers, temporary staff, agents, contractors, suppliers, external consultants, third-party representatives, and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

Clipstone is committed to making available sufficient resources for implementation of this policy and to ensure compliance with it. We are committed to enabling employees to properly understand and comply with this policy and to give adequate training on the issue of modern slavery and how it applies to Clipstone and our suppliers.

The Directors of Clipstone Investment Management Limited have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about this policy, to ensure it is effective in countering modern slavery.

Reporting Modern Slavery

If any employee, or anyone working for Clipstone under any other type of contract has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must bring this to our attention. All concerns must be raised in good faith, and every concern will be treated seriously and will be fully investigated.

Employees or anyone else working for Clipstone in any capacity should report any concerns or suspicions to Marc Cowley, Paul Priestley, Richard Demarchi or Toby Dean. All reports will be logged and investigated and where necessary the relevant authorities will be notified. 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.

Breaches of 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.