

## Introduction

This statement sets out CLS Group Services limited, CLS Property Insight limited, CLS Data limited, CLS Risk Solutions limited, Convey Choice Limited and Future Climate info Limited's ('CLS Group of Companies') actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

As part of financial services, property insurance sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of CLS Group of Companies. Our data, technology and insurance expertise enable us to design solutions throughout the property lifecycle in the UK and European markets.

Whilst the company exercises a vital role in the property market chain, it does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour.

## Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise concerns with the HR Manager or Compliance Officer.
- **Ethics and Code of Business Conduct Policy.** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier Policy** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. As a general rule, contractors and suppliers used by the CLS Group of Companies are not likely to be a susceptible to this risk. However, we are mindful that others may not always uphold standards to the same level as CLS. Consequently, employees responsible for managing suppliers and others involved with the CLS Group of Companies are, themselves, responsible for ensuring that our values and ideals are upheld. This continues to be a work in progress, and we are strengthening our controls as new contracts are agreed. Any serious violations by suppliers will lead to the termination of the business relationship.
- **Recruitment policy.** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency, this includes carrying out right to work checks. CLS Group of Companies do not employ individuals what would be considered to be “child workers”. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

### **Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation will check each supplier has considered their own company and supply chain for modern slavery and human trafficking.

### **Training**

The organisation will put in place training for 2019/2020 to require all staff within the organisation to complete awareness training on modern slavery.

### **Board approval**

This statement was approved on [date] by the organisation's [board of directors/members], who review and update it annually.