



Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Clearlingo has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Clearlingo has a zero tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Clearlingo provides interpreting, translation and transcription services to public services, businesses and individuals.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

1. Business Ethics policy: this policy is aimed at detailing the fundamental principles of ethical business behaviour within Clearlingo and defines the responsibilities of all employees and Company representatives.
2. Safeguarding: this policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
3. Recruitment policy: we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.



Suppliers

Clearlingo conducts due diligence on all supply chains before starting work. Clearlingo will not deal with individuals or businesses knowingly involved in slavery or human trafficking.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their activity
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national living wage

We may terminate the contract at any time should any instances of modern slavery come to light.

Awareness

We ensure our staff and linguists are aware of and know how to identify the signs of modern slavery and what to do if they suspect that slavery or human trafficking is taking place.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports have been received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Our abovementioned policies will be reviewed annually to ensure slavery and human trafficking is not taking place in our supply chain or own business.

Approval of this statement

The Finance Director is in charge of implementing this statement and its objectives and shall ensure slavery and human trafficking is not taking place within Clearlingo or its supply chains.

This statement was approved by the Board of Directors and a copy signed by the Directors of Clearlingo on 3rd April 2019.