

Anti-slavery and human trafficking policy.



This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This statement will be reviewed and published annually.

Organisation.

Established in 1977, Claremont is a UK privately owned company with the directors working in the business from offices in Warrington and Bristol. The Company has an annual turnover in excess of £32m with a financial year from 1st August to 31st July. Whilst our turnover is lower than the threshold for Companies to publish an annual statement, we believe slavery and human trafficking remains a hidden blight on our society and we should take all steps possible to promote ethical principles related to the prevention of exploitation and abuse associated with these practices. We have a responsibility to be alert to the risks, however small, in our business and the wider supply chain.

The company is audited annually in accordance with the applicable law, United Kingdom Accounting Standards and the Auditing Practices Boards Ethical Standards for Auditors. The directors are responsible for the preparation of the financial statements and for being satisfied that they give a fair and true view.

We are a provider of commercial interior design consultancy services, refurbishment and fit-out services and the procurement and installation of commercial furniture. 99% of our projects are implemented within the UK and Ireland, we occasionally provide design consultancy services to our clients for their overseas offices.

Our policies on slavery and human trafficking.

Claremont understands the need to be aware of the risks of modern slavery and human trafficking. We take a zero-tolerance approach to modern slavery in our business and in our supply chain and we are committed to acting ethically and with integrity in all our business relationships. We have implemented effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or our supply chains.

We have a whistleblowing policy in place, which is detailed fully in our employee handbook and located on our company intranet. Any concerns relating to modern slavery or human trafficking should be made in accordance with this policy.

Our supply chains.

Within our ISO certified integrated management system, we have a process in place for selecting preferred suppliers and sub-contractors which is reviewed regularly.

All new suppliers are required to complete a new supplier application form, which asks them to provide evidence of their own policies on slavery and human trafficking. Where our suppliers fall under the threshold for the requirement of a dedicated policy, we require them to comply with our policy.

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Our supply chain is divided into four types:

Approved list of office furniture:

1. Furniture constitutes around 15% of our purchases, of which:
 - a) 89% of furniture and accessories are purchased from UK manufacturers
 - b) 5.5% of furniture and accessories are purchased from countries within the EU area
 - c) 5.5% of furniture and accessories are purchased from outside the EU area

Office interior products, this may include lighting and carpeting from our preferred list of approved suppliers. The purchase value is a modest amount and would constitute less than 3% of our purchases.

2. The majority of works are procured on a supply and fit basis for individual packages of work from a preferred list of UK based sub-contractors and constitutes 60% of our purchases.
3. A minimal labour only supply for site procured through reputable agencies to support our activities on site. This constitutes less than 2% of our purchases (Site Labourers and Labour only flooring install)

Our approved supplier lists are available on request.

Due diligence processes for slavery and human trafficking.

As part of our initiative to identify and mitigate risk:

- Where possible, we build long standing relationships with our suppliers and make clear our expectations of business behaviour. We take a zero-tolerance approach to slavery and human trafficking.
- With regards to national or international supply chains, our point of contact is always with a UK company or branch and if applicable, we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place in their own right.
- We encourage the reporting of concerns and the protection of whistleblowers.
- The directors and senior management team have overall responsibility for ensuring our policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third-party business partners)

Signed:

Date: February 2021

For and on behalf of Claremont Group Interiors Ltd
Ann Clarke, Deputy Managing Director