

## **MODERN SLAVERY ACT 2015 AND TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010**

**This statement is published on behalf of Clarkson PLC, H. Clarkson & Company Limited and the other subsidiary companies within the Clarkson PLC Group (together “Clarksons”) pursuant to section 54(1) of the Modern Slavery Act 2015. This statement constitutes Clarksons’ Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2019.**

### **About Clarksons**

We are the world’s leading provider of integrated shipping services; we work with our clients to achieve their business objectives across all aspects of this complex and dynamic industry including shipbroking, financial services, port services and research. Further detail on the structure and operations of Clarksons can be found in the 2019 Annual Report, which is available on our website [www.clarksons.com](http://www.clarksons.com).

Our strategy is to offer ‘best in class’ integrated global services underpinned by our culture as a socially responsible business with ethical behaviour as a core value.

### **Modern Slavery and Human Trafficking**

Clarksons recognises that slavery, servitude, forced labour and human trafficking (“Modern Slavery”) is a global and growing issue. No sector or industry can be considered immune. We are committed to ensuring that there is no Modern Slavery of any kind within our operations or supply chains.

Clarksons’ Code of Business Conduct and Ethics (the “Code”) is a set of principles and guidelines which support ethical behaviour and decision making at Clarksons. All employees worldwide are expected to adhere to the terms of the Code and to engage with any third parties who work on behalf of Clarksons to ensure that they also co-operate with the Code.

If an employee has a concern about any activities in the Clarksons’ business, the Code provides a mechanism by which they can notify management. It is expected that all notifications under this Code are investigated as a matter of priority in order to reach a prompt resolution.

### **Respecting Employees’ Rights**

Clarksons believes that respect of human rights is integral to being a responsible company.

Clarksons places value on difference and believes that diversity of people, skills and abilities is a strength that helps us to achieve our best. Any discrimination based on race, religion, nationality, gender, age, marital status, disability, sexual orientation or political affiliation is prohibited within the business.

We are committed to providing a workplace free of any form of harassment or discrimination and expect our suppliers to do the same.

### **Our Supply Chain**

The supply chain to our business comprises worldwide suppliers providing a wide range of support functions and products including catering, maintenance, information technology, cleaning and security.

### **Clarkson PLC**

Registered office Address: Commodity Quay, St Katharine Docks, London E1W 1BF, UK | England No. 1190238  
T +(44) (0) 20 7334 0000

Quality system registered under ISO 9001 | Certified by BSI | License Number FS 30573

VAT Number: GB 245 9035 56

[www.clarksons.com](http://www.clarksons.com)

### **Actions Taken**

Throughout the year, we have continued to enhance our procurement procedures in line with best practice. In the UK, our IT supplier onboarding process has been strengthened, requiring key IT suppliers to provide details of their Modern Slavery arrangements as part of both onboarding and ongoing due diligence exercises and to confirm that appropriate arrangements are in place in relation to their own supply chain. Key IT suppliers which do not meet the standards we expect are not engaged to provide goods or services.

In other material supplier contracts in the UK, we endeavour to request that our suppliers commit to ensuring that they and their own supply chain comply with legislation with regard to Modern Slavery.

### **Next steps**

Clarksons remains committed to building and strengthening our existing policies and practices to eliminate Modern Slavery and human rights violations in our supply chain. We therefore aim to continue to review the effectiveness of our current arrangements and, where necessary, implement additional safeguards and procedures.

**This statement has been approved by the Board of Clarkson PLC on 30 June 2020.**



Jeff Woyda  
Chief Financial Officer and Chief Operating Officer  
Clarkson PLC  
Date: 30 June 2020