



## **Modern Slavery Statement 2024-2025**

## Clad Safety

### Financial Year 1st January 2024 - 31st December 2024

Clad Safety is committed to driving out acts of modern-day slavery from within its own business and from within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

This statement has been published in accordance with Section 54 of the Modern Slavery Act (2015) on behalf of Clad Safety.

Our FY2024 statement sets out Clad Safety's current activity and what plans we have in place to help tackle this issue in our supply chains and operations and to support stakeholder and industry-level activity to eradicate modern slavery.

Clad Safety understands the intricate nature of modern slavery and is committed to improving our practices to prevent it. Since modern slavery is a persistent problem that requires long-term solutions, we acknowledge that there are no quick fixes. We understand that our clients rely on us to handle this issue effectively so that they can feel secure when choosing to work with us.

### What is modern slavery?

Modern slavery is an overarching term used to describe its various forms.

- Human trafficking
- Forced and compulsory labour
- Bonded labour
- Slavery

Human trafficking is a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.

Forced labour is any work or service which people are not doing voluntarily, and which is exacted under the threat of some form of punishment.

Bonded labour is demanded as a means of repayment of a debt or a loan.

Slavery is a situation where a person exercises (perceived) power of ownership over another person.

*-ETI- Ethical Trade Initiative*

**In accordance with The Home Office's statutory guidance, this Modern Slavery Statement covers the following six areas:**

**Organisation structure and Supply Chain**

- Organisation structure and supply chains

**Process, Policy and Due Diligence**

- Policies relating to slavery and human trafficking
- Due diligence processes

**Assessing Risks**

- Risk assessment and management

**Monitoring**

- Key performance indicators to measure the effectiveness of steps being taken

**Cascading Knowledge**

- Training on modern slavery and trafficking



Clad Safety Ltd  
Head Office and Warehouse  
Bridge House  
Wetherby Road  
Knaresborough  
HG5 8LJ



### Organisation structure and supply chain

Clad Safety’s mission is to improve the working life and productivity of our customers by supplying innovative clothing, and solutions that protect and enhance the value of people. Established in 1989 Clad Safety is a privately owned company that has been successfully delivering a high standard of service to our customers for over 35 years.

In this time Clad Safety has expanded and evolved to be one of the leading suppliers of workwear, uniforms, and PPE to many corporations throughout the UK via our team in Knaresborough, North Yorkshire. Our own brand products are manufactured at 30 sites located across 8 countries.

We offer first-class technical products to businesses of all sizes across all industries. Our stock holding makes next-day delivery a reality and our accurate and reliable in-house logo service enables us to personalise products with either embroidery or heat-applied logos.

This modern Slavery Statement has been published in accordance with the UK Modern Slavery Act 2015 and was approved by the Directors at Clad Safety.

## Message from the Directors

Clad Safety Ltd is committed to driving out acts of modern-day slavery from within its own business and from within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier.

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we can confirm their identities and that they are paid directly into an appropriate, personal bank account.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and Senior Management shall take the responsibility for implementing this policy Statement.



Neil Trevvett  
Managing Director  
01<sup>st</sup> June 2025



Neil Trevvett  
Managing  
Director



Reggie Trevvett  
Commercial  
Director



Fred Trevvett  
Business Development  
Director

## **Policies in relation to modern slavery and human trafficking**

Clad Safety is committed to upholding human rights and ethical trade practices. We take pride in our ethical supply policy and ensure that all our products are ethically sourced. Our policies and procedures cover our own operations and supply chains to ensure that we conduct our business in a responsible and ethical manner. We are committed to internationally recognised human rights and ethical standards, including the ILO, and we follow the ETI base code principles. Our policies provide the framework in which we operate and play a critical role in ensuring that we have proper controls in place to manage and monitor ethical compliance. We implement the ETI base code in our business through our policies and codes of conduct. We ensure that our policies and procedures are aligned with our commitment to preventing modern slavery, human trafficking, forced labour, and exploitation.

### **Our Policies**

These are reviewed annually and updated when necessary to ensure they continue to remain aligned with international standards and best practices.

- Ethical Supply Chain Policy
- Labour standards policy
- Responsible Sourcing policy

These policies are published on our website. <https://cladsafety.co.uk/csr/>

We require our suppliers to comply with our policies and applicable laws. If our policies and applicable laws cover the same topic, suppliers must follow the one that gives greater protection to workers.

### **Code of Conduct**

As part of the onboarding process at Clad Safety suppliers are asked to agree to comply with our Code of Conduct. Our code of conduct aims to establish a fundamental framework of standards that reflect the differences in laws, customs, and economic conditions around the world. It has been aligned with the ETI base code and ILO standards.

### **Whistleblowing**

We have a whistle-blowing policy that is accessible to all colleagues. The policy provides details on how to contact the PROTECT hotline and how to report any allegations of modern slavery, fraud, misconduct, or wrong-doing. The whistle-blowing policy has been written in line with the company's grievance policies.

## Due Diligence process

New factories are asked to complete our onboarding process prior to any orders being confirmed. As part of this we request 3<sup>rd</sup> party audits dated within the last 12-24 months.

Accepted audit methodologies:

SMETA 2 or 4 Pillar

BSCI

SA8000

WRAP

### **Accepted audit firms:**

Any APSCA member firm and a verified CSCA-level auditor.

### **Accepted audit announcement types:**

Audits should be semi-announced with a minimum 2-week window, or fully unannounced. Fully announced audits will not be accepted.

Audits are then managed through our online portal which we provide without charge to our factories, we look for ongoing improvement, supporting factories to reduce any non-compliances that may arise and request updated orders every 1-2 years inline with the type of audit provided.

### **Verisio enhancing our due diligence process**

Clad Safety have partnered with Verisio, a global team of experienced auditors and supply chain officers with extensive industry knowledge who support us with the management of audits and to proactively mitigate risk within our supply chain.

Verisio's global team can conduct unannounced audits to uncover potential issues like child labour, falsified documentation, or serious health and safety breaches.

They help Clad to map our supply chain, currently to Tier 1, providing a visual representation of the supply chain to identify areas for risk prioritisation.

A great resource to us, Verisio can respond swiftly to any concerns we have, such as whistleblowing reports; dispatching their global network of auditors to investigate and provide guidance on remediation.

## Our Commitment

With a wide-reaching number of industries in our portfolio, the customer is at the core of our operations and our purpose is to keep those people safe at work. This purpose extends to colleagues at our head office and warehouse but also to those who design and make our products across our supply chain and the communities to which we live.



### Verisio partner since 2023

Specialising in supporting businesses with responsible supply chain management to drive positive social and environmental change. Assisting Clad Safety in going beyond audits and increasing our due diligence.

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### Sedex member since 2016



As members of Sedex, Clad Safety believe in operating with full supply chain transparency to ensure that our business is conducted ethically and fairly, particularly with regards providing fair wages and working conditions to workers throughout our supply chain. We expect our suppliers to uphold a high standard in their Ethical/Social working practices and use extensive questionnaires and independent audits to ensure that all our suppliers meet this standard.



### Verisio partner since 2023

Specialising in supporting businesses with responsible supply chain management to drive positive social and environmental change. Assisting Clad Safety in going beyond audits and increasing our due diligence.

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### Ethical Trade Initiative

Clad Safety is not currently a member of the ETI (Ethical Trade Initiative) but we do align our Ethical Code of Conduct with its base code which is based on the standards of the (ILO) International Labour organisation as a minimum standard of good practice.



## Risk assessment and management in our own brand supply chain

Whilst we don't own the factories that produce our goods, we know we have a responsibility to seek ways to protect all workers from modern-day slavery or human trafficking as well as promoting health, safety, and welfare in our supply chain.

When it comes to Modern Slavery, we cannot know what we cannot see so at present we have a focus on growing our level of transparency and deepening our understanding of inherent and residual risk within our supply chain.



The map above illustrates the countries our own branded products are currently being manufactured in.

Countries we currently source in are:  
India, Pakistan, China, Bangladesh, Turkey, UK

Manufacturing site ethical audits are graded based on non-conformities against the ETI base. We work with our factories directly and through Verisio to close any non-conformities.

Where factories are not able to supply a valid audit from our preference list, we will consider others by exception to reduce audit fatigue. Where factories do not hold audits and it is not financially viable for them to go down this route, we have created our own supplier questionnaire to encourage best practice.

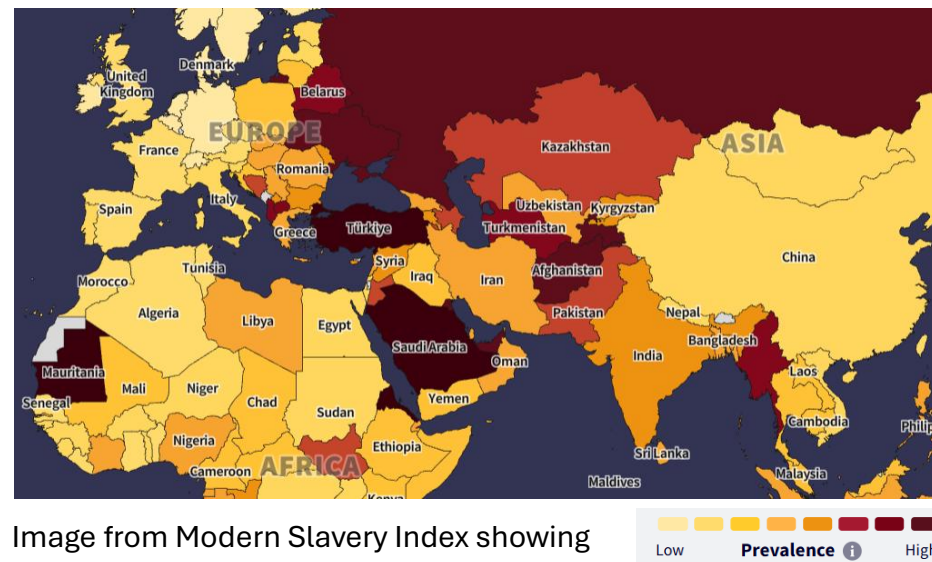


Image from Modern Slavery Index showing prevalence of modern slavery around the world

## Key performance indicators

6 monthly supplier mapping reports are shared with the director's detailing performance against the following KPIs:

## Performance against Key performance indicators

## Training on Modern Slavery and Human Trafficking

85% of Tier 1 manufacturing sites to have valid 3<sup>rd</sup> party ethical audits within the last 1-2 years dependant upon the audit supplied.

When graded through our RAG rating a minimum of 75% of our factories to achieve green 2025-2026.

\*working to increase to 100%

79% of all tier 1 suppliers audited with valid reports when this report is published.

60% of all factories achieving green through our RAG rating when this report is published.

As Clad Safety grows, we are increasingly aware that we must prioritise training and awareness programs to tackle Modern Slavery risks in our business and supply chains. We can see that by educating our colleagues and suppliers, we can develop the capability to manage incidents in a way that promotes positive outcomes.

During 2024 a 3<sup>rd</sup> party trainer delivery Modern Slavery training to all our Head office and Warehouse colleagues.

The objectives of this were to answer the below questions:

- What is the modern slavery act?
- What is modern slavery?
- Modern Slavery in the UK
- Types of modern slavery
- Spotting the signs
- What you should do

We know that our ability to drive change alone is limited and therefore we recognise the benefits of participating in initiatives where we can leverage wider resources from various sectors of the industry.

### Summary of progress in financial year ending January 2025:

- Continue to roll out our new training road maps for all areas of the business
- Further, improve the way we educate our colleagues on Modern Slavery- **3<sup>rd</sup> Party training given to all colleagues**
- Continue to increase the visibility of our manufacturing sites for our own brand products – **6 month reports shared with Directors**
- Establish a modern slavery policy that can be rolled out across our branded supplier network - **this policy to be shared with all our suppliers in 2025**
- Consider ways to assess risk within our supply chain and how we can present risk profiles to our stakeholders - focus for 2025-2026

### Additional KPIs introduced for 2025-2026

- 90% of staff to be trained in modern slavery within 6 months of joining the business
- 85% of all tier 1 suppliers audited/assessed currently at 79% when this report is published
- 100% of tier 1 suppliers to receive a copy of Clad's modern slavery statement
- 60% of all Tier 1 suppliers to provide their modern slavery policy by the end of 2025
- Top 85% of Clad Tier 1 supplier to complete supplier questionnaire by the end of 2025