

### Modern Slavery Act, 2022-23

#### Introduction:

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

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. CPL has a zero tolerance approach to any form of modern slavery and is committed to acting ethically and with integrity in all business dealings.

### Who are we and what do we do?

Clarion Payroll Ltd provides Umbrella services to recruitment agencies, contractors and temporary workers across a range of industry sectors.

Established in 2022, compliance, customer service and professionalism are at the heart of everything we do.

#### Where are we?

We are a UK based company located in North Wales. We have no offshore affiliations and we work with contractors, freelancers and employment / recruitment agencies throughout the UK.

#### What do we stand for?

Our business is compliance led with a strong customer-centric and technology—driven approach to delivering our services. We operate in a highly regulated environment and absolute compliance with tax regulation and employment law is at the heart of our offering.

Clarion Payroll is a member of Professional Passport (www.professionalpassport.com), the organisation that sets the highest standard of compliance in the sector and drives the compliance agenda with HMRC

### Our workers:

As a contractor umbrella, a large part of our business involves the employment of freelancers undertaking agency assignment work. To ensure that modern slavery or human trafficking is not taking place within our business, prior to any new starter joining CPL, whether it's through our umbrella solution or joint employment services, we fully discuss their circumstances, how they have come to work as a freelancer, their appetite for contracting and we ensure the best advice is offered based on the worker's individual circumstances.

We ensure all workers are subject to full UK Right to Work ("RTW") checks and we validate their identity with an online RTW and identity checking system owned and operated by World Check.

## Our suppliers:

We conduct due diligence on all suppliers before entering into any contractual arrangement.

This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery.

We further require that they confirm to us that:

- 1. They have taken steps to eradicate modern slavery within their business;
- 2. They hold their own suppliers to account over modern slavery;
- 3. They pay their employees at least the national minimum wage / national living wage (as appropriate)

# Training:

We regularly conduct training for all head office employees so that they understand the signs of modern slavery and where to report any concerns they may have.

# Approval for this statement:

This statement was approved by the Board of Directors on 01st February 2023

Steve Conway
Managing Director

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01 February 2023