

Anti-Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the UK *Modern Slavery Act 2015* and sets out the steps the organisation (**CLC World, we and our**) has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

We have assessed our risk to modern slavery and human trafficking as low. This assessment is made based on geography, the nature of the business and business transactions.

Within our business we have implemented various policies and in our staff handbooks (**Handbooks**) we set out our expectations in terms of issues such as working hours, child labour, forced labour, discrimination, health and safety and so on. In addition, we have a written Code of Conduct (**Code of Conduct**) which is the foundation of our business culture and emphasises our focus on upholding our core values such as the commitment to our employees and standards for doing business. The Code of Conduct and Handbooks include our responsibility to apply and follow all applicable local laws and to require any supplier or third party who works with CLC World to comply with similar fundamental principles. We expect all parts of the business to adhere to this policy and will conduct internal audits to ensure compliance. We regularly conduct internal training to raise awareness amongst staff.

We currently have a number of suppliers spread predominantly across the EU and USA. We encourage our suppliers and associated businesses to adopt similar policies to our own and seek only to work with suppliers who have similar policies, terminating our relationships with any suppliers who do not comply with our policies or who do not address non-compliance in a timely manner.

We dedicate considerable resources to training and re-training our staff however given the wide ranging nature of our training programmes and our low risk activities we do not feel we have to have a specific module dedicated to anti-slavery and human trafficking.

The Board of Directors will take responsibility for ensuring that this statement is up to date and reflects the actions CLC World is taking to tackle slavery and human trafficking.

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[Prize Winners](#)
[Modern Slavery Statement](#)



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