

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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 (the “Act”). This statement constitutes Clarksons’ Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2022.

Introduction

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.

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.

Our purpose

We enable smarter, cleaner global trade by empowering our clients and our people to make better informed decisions using our market-leading technology and intelligence; and in doing so, meet the demands of the world’s rapidly evolving maritime, offshore, trade and energy markets.

Our values

- We always act with integrity
- We’re dedicated to excellence
- We collaborate and challenge

Organisational structure

Clarkson PLC (the “Company”) is the parent company of the Clarksons Group and is headquartered in London. The Company’s shares are listed on the London Stock Exchange under the ticker CKN. The Group operates in 24 countries across 56 offices and has over 1,800 employees.

With the exception of our Support division, all activities are office-based only.

Our Supply Chain

The supply chain to our business comprises worldwide suppliers providing a range of support functions and products including catering, maintenance, information technology, cleaning and security. Whilst we do not consider suppliers to be a significant stakeholder in our business due to the nature of our business model, we are committed to treating our suppliers fairly.

Policies

Clarksons’ Ethics Policy and Compliance Code (the “Code”) is a set of principles and procedures to support ethical behaviour and decision making at Clarksons. All employees worldwide are expected to adhere to the terms of the Code and to require any third parties who work on behalf of Clarksons to do the same. Our training modules which cover the Code are updated annually with relevant and current examples of compliance risks. All staff must complete this online training every year.

If an employee has a concern about any activities in the Clarksons’ business, the Group’s Whistleblowing Policy provides a mechanism by which concerns can be raised in confidence (and anonymously). This is operated by an independent third-party provider. Whistleblowing arrangements and reports arising from its operation are overseen by the Company’s Board. There have been no reported cases concerning Modern Slavery.

Respecting Employees’ Rights

We believe that the respect of human rights is integral to being a responsible company and we are committed to treating individuals with respect and dignity.

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.

Actions Taken

In 2022, we undertook a review of our use of third-party recruitment agencies (“Agencies”) and have established the following principles:

- We expect Agencies to uphold the same high standards and procedures to safeguard against Modern Slavery and to fully comply with the Act.
- Agencies are asked to agree to our terms of business, which include an obligation to act in accordance with the Act and allowing for termination in the event of non-compliance.
- We expect Agencies to hold their own suppliers to the same high standards and implement appropriate due diligence in relation to Modern Slavery in their supply chains.
- If we find evidence that an Agency is in breach of the Act or failing to implement satisfactory policies and procedures, then we will take appropriate action.

Our policy of a relatively low use of Agencies remains the same.

In the UK, we continue to carry out robust supplier onboarding processes, requiring key 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. Our Supplier Charter asks our suppliers to commit to respecting human rights, diversity, inclusion and the environment. Suppliers which do not meet the standards we expect are not engaged to provide goods or services.

In material supplier contracts in the UK, we endeavour to request that our suppliers commit to terms requiring 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.

In the next 12 months, we plan to review our vendor questionnaire to ensure alignment with our Supplier Charter; and we will be making a Modern Slavery module available to staff on the Clarkson Academy to strengthen the focus in this area.

This statement was approved by the Board of Clarkson PLC on 29 June 2023.



Jeff Woyda
Chief Financial Officer and Chief Operating Officer
Clarkson PLC
Date: 29 June 2023