

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Statement for the year ending 31 March 2023. The statement has been approved by the company's director/s and will be reviewed annually.

1. ORGANISATION

Cliff42 is a Small to Medium Enterprise (SME) public protection technology business. In addition to staff employed by the company we work with a number of associates. We have clients in both the public and private sectors. Our work is focused on public safety outcomes with a focus on how this is achieved through the use of technology. We are committed to ensuring everyone who works for and with us is treated fairly, can work safely and has their human rights protected and respected. Our supply chains can be complex, extensive and cover a wide range of products, goods, and services. We have a responsibility to prevent modern slavery from occurring in any form across our organisation and within our supply chains or end customers; we are committed to ensuring our organisational practices and risk-management approach support and facilitate this.

2. APPROACH TO TACKLING MODERN SLAVERY

We have a targeted approach to identifying and tackling ethical issues, including modern slavery, both in our organisation and supply chain. We have governance and management arrangements which are focused on the issue of modern slavery.

- We regularly assess our risks and their mitigation, capturing these, including those relating to modern slavery, in our risk register. This drives our collaboration and good practice sharing across the organisation (including Associates), supply chain, customers, and stakeholders. The assessment enables us to identify our risks within and throughout the business. Our due diligence processes continued to identify and monitor issues, and work towards their resolution. Using a risk-based selection of both new and existing suppliers on ethical trade and modern slavery issues. This enhances our own processes, and those of our suppliers and customers
- Policies and guidelines for Cliff42 set out our expectations of our people, associates, stakeholders, and suppliers. These policies are issued at the point of engagement with the individual or supplier, are accessible in directories on our website, and are reviewed at least every three years.
- During each business year we will ensure that relevant policies are included in contracts with our suppliers and customers. We actively discuss our expectation prior to and throughout any contract period. We include questions on ethical trade and monitoring in our procurement activities. We take into account individual relationships cognisant of the type of product and/or service being provided or the subject of any contract.
- We regularly monitor compliance with our policies making use of our established governance arrangements. We will continue to develop further measures to provide greater oversight of the effectiveness of our policies, to assure that we are not directly or indirectly party to Modern Day Slavery or Human Trafficking.
- We engage directly with key teams and suppliers to help raise their awareness and understanding of the risks associated with modern slavery and the expectation that Cliff42 has in managing these.

- Training on ethical trade and fair trading will be part of our awareness-raising approach, especially for individuals directly engaging in related activity.

3. FUTURE PLANS AND PRIORITIES

We appreciate the significance of our role in helping to identify, prevent and help eradicate modern slavery. We are committed to continuously improving and evolving our practices in relation to operating a responsible organisation, sourcing products and services ethically, and helping to raise standards across the public protection industry.

In line with our multi-year outlook, during the next year we will:

- Collaborate with key partners and peers to continually enhance our approach.
- Take a risk-based approach and revisit our ethical risk assessment at least annually.
- Review our approach considering changes arising from Covid-19 and in preparation for changes because of HM Government review into transparency in supply chains.
- Widen the ethical trade training offered across Cliff42 to promote awareness and understanding.
- Enhance measures used to monitor the effectiveness of our ethical trade programme.
- Create a whistleblowing policy that includes human rights issues, such as modern slavery.

This has been approved by the Cliff42 Company Director, Simon Clifford, on 1st April 2022.

Signature:

A handwritten signature in black ink, appearing to be 'S Clifford', written over a faint grid pattern.

Name: Simon Clifford