

THE CLARUS
NETWORKS GROUP



**Modern Slavery and Human
Trafficking Statement for the year
ended 31 December 2025**

Versioning History

DOCUMENT CLASSIFICATION	Protected
DOCUMENT REF	HR-POL-DOC-08A
VERSION	4
DATED	10 February 2026
DOCUMENT AUTHOR	Emma Gartland
DOCUMENT OWNER	Debra Phillips, Director

Revision history

VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES	DISTRIBUTION
1	01/05/23	Kathryn Andrews	Simplified layout, clarification of statement	All staff, subcontractors and customers on request
2	01/05/24	Kathryn Andrews	Review	All staff, subcontractors and customers on request
3	08/04/25	Kathryn Andrews	Review	All staff, subcontractors and customers on request
4	09/02/2026	Emma Gartland	Review	All staff, subcontractors and customers on request

Approval

NAME	POSITION	SIGNATURE	DATE
Debra Phillips	Commercial Director		17 July 2023
Debra Phillips	Commercial Director		2 May 2024
Debra Phillips	Commercial Director		8 April 2025
Debra Phillips	Commercial Director		10 Feb 2026

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Introduction

This modern slavery and human trafficking statement is made on behalf of The Clarus Networks Group pursuant to section 54(1) Modern Slavery Act 2015.

Our Business

The Clarus Networks Group is a provider of specialist connectivity solutions. The Group operates within the UK, EU, USA and Middle East and exports globally.

Our Supply Chains

We are committed to ensuring our supply chain is free from any form of slavery or human trafficking.

As we operate in the telecommunications industry, our supply chain is centred around the purchasing of goods and services that support the installation of connectivity equipment, including the use of sub-contractors for installations, and the functioning of our office.

Consumables purchased include electronics such as satellite antennas, internet routers and associated components, office supplies, marketing materials, IT equipment and estate services such as cleaning, waste management, office fixtures and fittings and security.

We believe in supporting the local businesses and many members of our supply chain are local (Scottish) businesses who have their own due diligence in place to ensure they procure services and/or materials from socially responsible organisations. As we predominately operate geographically within the UK, and our supply chain is predominantly UK based, our verification of supply chains includes fair treatment and pay of workers and verification of the right to work in the UK.

While we do not primarily operate in high-risk sectors or locations, we do export and we are mindful that we do not become complacent in this regard. We regularly evaluate the nature and extent of the firm's exposure to the risk of modern slavery mitigating any potential risks as appropriate.

Consumables are sourced from the UK wherever possible. Specialist telecommunications equipment is sourced from the United States of America, China and Taiwan.

Our Policies and Controls

We have the following policies in place to ensure we conduct all business in an ethical manner and we are committed to being a transparent organisation.

- Anti-slavery policy.
- Whistleblowing policy
- Recruitment policy
- Code of conduct
- Training

Our policies apply to everyone who works for the Group. All employees **must** confirm that they have read and understand the information contained within them.

Due Diligence Processes

We have put measures in place to ensure that all parts of our business and supply chain are slavery free. We assess the steps our suppliers have taken to ensure their own supply chain is free from slavery or human trafficking at the supplier selection stage and annually thereafter.

Risk Management and Assessment of Effectiveness

The measures we have undertaken to identify and manage the risks of human trafficking and slavery occurring within our business or supply chain include:

- Undertaking a risk assessment of our supply chain, based on annual spend, invoice frequency and other material factors. We continue to implement and enforce effective systems and ongoing controls with new and existing suppliers. We will investigate any potential risk areas and take action (including termination) as appropriate.
- We continue to engage with our suppliers and are mindful of the environmental, social and economic impact our procurement decisions may have on influencing positive social and economic change.
- We acknowledge that in periods of economic downturn there are increased vulnerabilities to modern slavery, particularly as businesses implement cost cutting measures. We are alert to the potential for exploitation and it is important for us to retain visibility of our wider supply chain and their ethical sourcing.

We have a zero-tolerance attitude towards human trafficking and slavery at all points within our supply chain.

Training

To ensure a satisfactory level of understanding of the risks and signs of modern slavery and human trafficking in our supply chains and our business, we have made available e-learning resources to all of our staff. This training module must be completed on an annual basis and concludes with a mandatory test of understating with an 80% pass rate. This is to help ensure our staff have both the technical competencies and value-based skills available to empower them.