



## MODERN SLAVERY STATEMENT



### INTRODUCTION

Clearvision has three core values that are at the heart of everything we do. One of them, quite simply, is Decency. We want to live in a world where people act with Decency in everything they do.

At Clearvision our 'visionaries', that is to say the people we employ, are at the heart of our business. We strive to provide decent working conditions, a safe working environment and respect for their rights as workers. We recognise that our biggest risk, and the place where we can make the biggest difference is not within Clearvision itself, but within our supply chain.

We are on an educational journey and to support us on that journey we have followed the UN Guiding Principles on Business and Human Rights and have sought advice from charities and other companies leading the charge against Modern Slavery.

This report outlines what we have done, and what we intend to do to identify, prevent and resolve any kind of labour exploitation in our business and in our supply chains.

*Gerald Tombs*

This statement has been published in accordance with the UK Modern Slavery Act 2015 for the financial year ending 30 April 2022. This statement was approved by Gerry Tombs, CEO.

## WHAT IS MODERN SLAVERY?

Modern slavery is the severe exploitation of other people for personal or commercial gain. Modern slavery is all around us, but often just out of sight.

Modern slavery takes many forms. The most common are:

- **Human Trafficking.** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- **Forced Labour.** Any work or services people are forced to do against their will under threat of punishment.
- **Debt bondage/bonded labour.** The world's most widespread form of slavery. People trapped in poverty borrow money and forced to work to pay off debt, losing control over both their employment conditions and the debt.
- **Descent based Slavery.** Most traditional form, where people are treated as property, and their "slave" status is passed down the maternal line.
- **Slavery of children.** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.
- **Forced and early marriage.** When someone is married against their will and cannot leave. Most child marriages can be considered slavery.

Source: [Anti Slavery.org](https://www.antislavery.org)

## OUR BUSINESS AND STRUCTURE

Clearvision is an Atlassian Platinum Solution Partner. We sell third party software licences to customers across the world as well as providing related support, training, consultancy and hosting services. All our sales are business to business and most of our engagements conducted remotely.

We have an office in the UK and the USA. At the end of the financial year we directly employed 73 people across both offices.

## **OUR SUPPLY CHAINS**

All our services are managed and delivered directly by Clearvision. Clearvision partners with a number of third party vendors for the resale of their software products. These direct first tier suppliers operate across the globe.

We also source products and engage services that support us in our work such IT equipment, office equipment, professional services and external contractors.

## **WORKING GROUP**

In June 2021 Clearvision established a working group to coordinate our efforts in tackling, preventing and addressing modern slavery. The working group consists of representatives from legal, compliance, human resources and bids and proposals.

Whilst much of the activities surrounding our efforts to combat modern slavery are now part of business as usual, the working group meets at least annually to review progress against our objectives and to plan for the year ahead.

## **OUR COMMITMENT**

The working group will monitor, review and report in subsequent statements on the progress and effectiveness of our activities to combat modern slavery and labour exploitation within our business and supply chains.

We will take what we have learnt and build on it each year to continually improve on our performance and to make greater strides to tackle Modern Slavery.

## **OUR PERFORMANCE IN 21/22**

Last year we set a number of priorities and as part of our desire to operate as transparently as possible, we have shared below how we are performing against them.

We have used a simple RAG system to show progress.

Objective	Status	Overview
Fully map our supply chain including all lower tier suppliers	On Track	All of Clearvisions first tier suppliers have been mapped. Given the size and nature of our business we have decided not to map lower tiers at this time
Conduct a risk assessment of our entire supply chain	On Track	A risk assessment has been completed for every mapped supplier. There have been no medium or high risks indentified
Train every Clearvision employee on how to spot the signs of modern slavery and what to do if spotted	On Track	All employees have completed mandatory training
Implement and train employees on our Modern Slavery - Supply Chain Risk Management Guidance	On Track	All applicable employees have been trained on the guidance
Establish a program of internal awareness activities that supports the formalised training program	At Risk	Awareness activities were planned for each 1/4 but only 50% were carried out as planned
Create a code of ethics and share with all suppliers seeking their agreement to the code	On Track	This objective continues into 22/23 as Clearvision intends to incorporate Modern Slavery compliance expectations into a wider code of conduct for suppliers
Update our contracts inline with our Modern Slavery - Supply Chain Risk Management Guidance	On Track	All contracts have been updated
Find opportunities to collaborate to support our efforts to tackle modern slavery & labour exploitation	At Risk	Responsibility for such activities has recently been assigned and so we plan to see much greater progress against this objective in 22/23

## OUR PRIORITIES FOR THE YEAR

- Find opportunities to collaborate to support our efforts to tackle modern slavery & labour exploitation
- Establish a program of internal awareness that activities that supports the formalised training program
- Complete 100% of annual risk assessments by there due date
- Create a code of ethics and share with all suppliers seeking their agreement to the code
- Complete 100% of annual training refreshers by there due date