

MODERN SLAVERY POLICY

Clark Dental Equipment Systems Ltd

Policy Owner	Chief Financial Officer
Effective Date	January 2026
Version	2.0
Next Review	January 2027

1. POLICY STATEMENT

Modern slavery is a crime and a fundamental violation of human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking.

Clark Dental Equipment Systems Ltd has a zero-tolerance approach to modern slavery and is committed to acting ethically, responsibly and with integrity in all of our business dealings and relationships.

We are committed to taking reasonable and proportionate steps to prevent modern slavery from occurring within our own business and our supply chains. We will seek to identify, assess and manage the risks of modern slavery and will take appropriate action where concerns or instances of modern slavery are identified.

We expect the same high standards from our suppliers, contractors, business partners and other organisations with whom we work.

This policy is intended to support compliance with the Modern Slavery Act 2015 and relevant UK guidance.

2. SCOPE

This policy applies to everyone working for or on behalf of Clark Dental Equipment Systems Ltd, including employees at all levels, directors and officers, agency and temporary workers, contractors and subcontractors, consultants, suppliers and service providers, agents and representatives, and other business partners.

It applies to our own operations and to the supply chains supporting our business.

3. OUR RESPONSIBILITIES

The Finance Director has overall responsibility for this policy and for ensuring that appropriate arrangements are in place to prevent and address modern slavery risks.

The Finance Director is responsible for maintaining and reviewing this policy; ensuring appropriate risk assessment and due diligence processes are in place; monitoring compliance; ensuring concerns are investigated appropriately; ensuring relevant employees receive appropriate information or training; reviewing the effectiveness of our controls; and reporting significant issues to senior management/directors.

Management at all levels are responsible for ensuring that people working under their supervision understand the requirements of this policy and know how to raise concerns.

All employees and individuals working on our behalf have a responsibility to remain alert to potential signs of modern slavery and to report concerns promptly.

4. MODERN SLAVERY RISK ASSESSMENT

We recognise that modern slavery risks can arise in different parts of our business and supply chains.

We will consider relevant risk factors when assessing our exposure to modern slavery, including, where appropriate, the countries and regions in which suppliers and workers operate; the nature of the goods or services being supplied; the use of temporary, agency or migrant labour; recruitment practices; working conditions; the complexity and length of supply chains; sectors or activities known to present higher risks; and any information, allegations or concerns relating to a supplier or business partner.

Our approach will be proportionate to the size and nature of our business and the level of risk identified.

Where higher risks are identified, we will consider whether additional due diligence or monitoring is appropriate.

5. SUPPLIER AND SUPPLY-CHAIN DUE DILIGENCE

We expect suppliers, contractors and business partners to operate in accordance with applicable laws and ethical standards and to take reasonable steps to prevent modern slavery within their own operations and supply chains.

Where appropriate and proportionate to the level of risk, we may request information from suppliers about their approach to modern slavery; require suppliers to confirm compliance with applicable legislation; include modern slavery requirements within supplier terms and conditions or contracts; assess relevant supplier policies and procedures; request information about labour and recruitment practices; investigate concerns or allegations relating to suppliers; and take appropriate action where a supplier fails to meet our required standards. We will seek to ensure that our key suppliers understand our zero-tolerance approach to modern slavery.

Where appropriate, suppliers will be expected to apply equivalent standards to their own suppliers and subcontractors.

6. RECRUITMENT AND EMPLOYMENT

We are committed to fair and lawful employment practices.

We will not knowingly employ anyone under conditions that amount to forced, compulsory or trafficked labour.

We expect individuals working for us to have the freedom to leave their employment in accordance with applicable contractual and legal requirements and will not tolerate practices involving coercion, threats, deception or the withholding of personal documents for the purpose of exploitation.

Where recruitment agencies or other third parties are used, we expect them to operate lawfully and ethically and to comply with applicable employment legislation.

7. IDENTIFYING AND REPORTING CONCERNS

Everyone working for or on behalf of Clark Dental Equipment Systems Ltd is encouraged to raise concerns at the earliest opportunity if they believe that modern slavery may be taking place.

Concerns may relate to our own business, a supplier, contractor, subcontractor or any other part of our supply chain.

Concerns should be reported to the Finance Director or through the Company's established Whistleblowing Policy/reporting procedure.

A person does not need to be certain that modern slavery is taking place before raising a concern.

8. PROTECTION FOR PEOPLE RAISING CONCERNS

We encourage openness and will support anyone who raises a genuine concern in good faith.

We will not tolerate retaliation, victimisation or detrimental treatment of anyone who raises a genuine concern about modern slavery or assists with an investigation.

Concerns will be handled appropriately and, where possible, confidentially.

9. RESPONSE TO IDENTIFIED MODERN SLAVERY

Where an actual or suspected instance of modern slavery is identified, we will take appropriate and proportionate action.

Our response will prioritise the safety and welfare of any potential victim.

Depending on the circumstances, action may include investigating the concern; seeking appropriate professional or specialist advice; reporting suspected criminal activity to the appropriate authorities; taking steps to protect affected individuals; requiring corrective action from a supplier; suspending or reviewing a supplier relationship; and/or terminating a business relationship where appropriate.

We recognise that simply terminating a supplier relationship may not always be the most appropriate response, particularly where doing so could increase the risk of harm to affected workers. Our response will therefore take account of the circumstances and potential impact on individuals.

10. TRAINING AND AWARENESS

We will provide appropriate information and/or training to relevant employees based on the level of risk and their responsibilities.

Training and awareness may include what modern slavery is; the risks relevant to our business and supply chain; how to recognise potential warning signs; how to raise concerns; and the responsibilities of employees involved in procurement, supplier management or recruitment. We will also communicate our expectations regarding modern slavery to relevant suppliers, contractors and business partners.

11. MONITORING AND EFFECTIVENESS

We will periodically review the effectiveness of the measures we have in place to prevent and address modern slavery.

Where appropriate, we may monitor indicators such as completion of relevant employee training; supplier compliance or declarations; completion of supplier due diligence; number and nature of concerns raised; actions taken in response to identified risks; supplier reviews or audits undertaken; and progress against identified areas of improvement.

The results of monitoring will be considered when reviewing this policy and our approach to modern slavery risk.

12. POLICY REVIEW

This policy will be reviewed at least annually and sooner if there are significant changes to applicable legislation or government guidance, our business activities, our supply chains, identified modern slavery risks, or our internal policies and procedures.

The next scheduled review is January 2027.

13. BREACHES OF THIS POLICY

Any employee who breaches this policy may be subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may review, suspend or terminate our relationship with suppliers, contractors or other business partners who fail to meet the requirements of this policy, subject to the circumstances and appropriate remediation considerations.

14. MODERN SLAVERY STATEMENTS

Clark Dental Equipment Systems Ltd is currently below the £36 million annual turnover threshold that requires organisations within the scope of section 54 of the Modern Slavery Act 2015 to publish an annual modern slavery statement.

We nevertheless recognise the value of transparency and maintain this policy to explain the steps we take to prevent modern slavery in our business and supply chain.

If our circumstances change and we become subject to a statutory reporting requirement, we will comply with the applicable requirements.