



Engineer - Install - Maintain

## Slavery and Human Trafficking Statement 2024

## **1. Modern Slavery**

Modern Slavery is an umbrella term that encompasses slavery, forced labour, servitude and human trafficking. It is a crime and a violation of fundamental human rights. Under the UK Modern Slavery Act 2015, businesses are required to report on what actions they have taken to ensure there is no modern slavery within their supply chains and business operations.

Clarke Energy has a zero-tolerance approach to slavery and human trafficking and opposes all forms of human rights abuse. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our supply chain.

## **2. Our Business**

Clarke Energy is a multinational specialist in distributed power generation solutions. Our international headquarters are located in Knowsley, near Liverpool in the United Kingdom. Our capabilities range from the supply of a gas fuelled power generation engine, through to the turnkey installation of a multi-technology power plant (including renewables). Clarke Energy is an authorised distributor and service provider for INNIO Jenbacher reciprocating gas engines with a strong focus on aftersales support. Clarke Energy's relationship with Jenbacher and in-country resources gives us an ability to provide unparalleled service and maintenance, along with local supply of original equipment manufacturer approved spare parts.

Clarke Energy is part of Kohler Co., our ultimate parent company, which has its head office in Wisconsin, USA. Kohler Co. employs around 36,000 employees across 48 manufacturing locations worldwide.

### **3. Due Diligence**

We consider comprehensive and robust internal and external due diligence a key part of our modern slavery risk assessment framework in helping us to understand, identify and manage potential modern slavery risks for our business. To that end, we only work with suppliers who have completed our rigorous on-boarding process and have provided information in relation to their own position on slavery and human trafficking where applicable.

#### **3.1. Labour Force**

Clarke Energy employs circa 400 people in the UK and Ireland and over 1400 people globally. We understand that the risk of modern slavery in labour forces is high. Our human resources team ensure that all our employees are subject to various and stringent human resources processes to ensure a right to work. We treat all our employees with equality and respect and ensure, among other things that: (i) working hours comply with relevant national laws; (ii) our employees are remunerated with wages and benefits set at or above local minimum wage requirements; and (iii) our working conditions meet the standards of the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (UDHR). We therefore expect and require our suppliers to demonstrate the same level of commitment with the existence of processes and procedures to ensure our high standards are met.

#### **3.2. Our Business Operations & Supply Chains**

We operate in c. 28 countries around the world. We conduct a risk assessment of every country we operate in or source our goods from. We found that whilst we operate in countries which are deemed to be high risk countries of modern slavery we do not manufacture or distribute goods which, according to the Global Slavery Index, are at heightened risk of modern slavery. We do however source high risk goods from indirect suppliers such as laptops, computers and mobile phones, along with garments in the form of workwear for our employee and business needs.

We have therefore conducted audits and assessed our suppliers to satisfy ourselves that they meet our strict criteria and that they are taking a proactive approach to ensure there is no modern slavery occurring in any part of their supply chain.

#### **4. Our Policies**

All our employees, suppliers, contractors and sub-contractors must adhere to all our policies relevant to modern slavery, including our Ethical Procurement Policy and our Anti-Slavery and Human Trafficking Policy. All of our company policies are reviewed annually or when there are changes in legislation, regulations or best practice guidelines, to ensure they are effective.

#### **5. Training**

All new employees are trained with respect to modern slavery on induction to the company, and all UK based employees are provided with modern slavery training on a recurring basis. Further to our commitments in previous reports, we strengthened our employee training by offering more in-depth training to relevant employees who will continue to receive this training annually. As part of Kohler Co., all of our employees are also required to complete annual ethics training.

We actively encourage our employees, in line with our whistleblowing policy and Kohler Ethics helpline, that should they have any genuine concerns of modern slavery or human rights abuses within our supply chain or our labour force, they should report their suspicions immediately for further investigation. Even if an employee is mistaken with their suspicions, we are fully committed to supporting our employees and ensuring they are treated fairly with no repercussions.

#### **6. Supplier Audits**

Modern slavery questions are included within our supplier audits which involve going onsite to meet and assess certain suppliers, focusing on their processes and procedures on modern slavery. Whilst our smaller suppliers are exempt from the reporting requirements of modern slavery, we hope that by bringing an awareness

to this issue and the many forms which modern slavery encompasses, we can assist in ensuring that any potential risk of modern slavery will be reduced.

## **7. Reports of Modern Slavery**

We have not received any complaints or reports in relation to modern slavery within our business operations or throughout our supply chain.

This statement has been approved by the board of directors of Clarke Energy Limited for as the parent company of the Clarke Energy group of companies. This statement is made in respect of Clarke Energy Limited together with all of its subsidiary undertakings from time to time and is made pursuant to section 54(1) of the Modern Slavery Act 2015, section 16(1) of the Australian Modern Slavery Act 2018 and constitutes the Clarke Energy Group's Slavery and Human Trafficking Statement for the financial year ended 31st December 2023.



Jamie Clarke | **Chief Executive Officer**  
Clarke Energy

Date: 23 January 2024