



Anti-Slavery and Human Trafficking Policy





This Policy outlines the efforts Clarus will make to seek to eradicate human trafficking and slavery from our supply chains. Clarus opposes any use of slavery or human trafficking in the manufacture and distribution of our products and fully supports the promotion of ethical and lawful business practices within our workplace. Clarus will not tolerate or condone any form or practice that constitutes human trafficking or slavery in any part of our global organization.

Clarus's suppliers are an important part of our success. We expect each of these business partners to conduct their business with the same commitment to ethical business practices as Clarus. The workplace practices that we expect from our suppliers include:

- Suppliers are not to use slave labour illegal child labour or forced labour.
- Suppliers will ensure that the overall terms of employment are voluntary.
- Suppliers shall follow all local applicable laws pertaining to minimum age requirements, wages, overtime and benefits.
- Suppliers shall follow all local applicable laws pertaining to the number of hours worked in a seven (7) day week.
- Suppliers will periodically certify that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.

Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of Clarus. Clarus will conduct internal verification of product supply chains to evaluate and address risks of human trafficking and slavery.

Clarus will maintain internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking.

Clarus will promptly and thoroughly investigate any claim or indication that a supplier is engaging in human trafficking or slave labour.

If a supplier to Clarus is found in violation of this policy, Clarus will take prompt, remedial measures to address the violation.

Clarus will provide ongoing training to its employees (including those who have direct responsibility for supply chain management), on the laws and Clarus's policy against human trafficking and slavery.

D. Andrews

Signed: Debra Phillips, Director

Date: 2nd April 2018

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