

Modern Slavery Statement

CLUE

Modern Slavery Statement 2026

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1. PURPOSE AND SCOPE

This statement is published pursuant to section 54 (1) of the Modern Slavery Act 2015 (MSA) for Clue Computing Company Limited (company number 01715616) (“Clue, our, we”).

It sets out the steps taken during our last financial year (1 January 2025 to 31 December 2025) to ensure that slavery and human trafficking is not taking place in our supply chain or in our own business.

It reflects our commitment to ensuring there is no slavery and human trafficking in our own workforce as well as providing fair and safe working conditions for our employees. We are also committed to managing risks in our supply chain, to ensure that our supply chains are socially responsible and free from slavery and human trafficking.

We are absolutely committed to high ethical standards when conducting our business and we recognise that slavery and human trafficking is both illegal and abhorrent.

While Clue is under the reporting thresholds of the MSA, we are publishing this statement on a voluntary basis.

We recognise that modern slavery can take many forms including human trafficking, bonded labour and other forms of enslavement. We respect and adhere to various international human rights standards as set out in the International Bill of Human Rights and the International Labour Organization Fundamental Principles. We have processes in place to help prevent modern slavery from occurring in our workforce and in our supply chain.

2. COMPANY STRUCTURE, BUSINESS AND SUPPLY CHAINS

Clue is a relatively small SME, with under 90 employees and a turnover of under £10m. Clue does not operate through any other trading entities.

Clue is a SaaS platform supplier and therefore supplies software services. Our cloud-based investigation case management system and intelligence platform is used by police, governments, the private sector, sport and not-for-profit sectors to help counter serious and organised crime, corruption, safeguarding, environmental, financial and corporate wrongdoing and threats.

Clue supplies around 120 customers, which are mainly UK public sector bodies.

Clue’s activities are based at our offices in Bristol and our employees follow a remote or hybrid working pattern in the UK.

Our employees are in the UK, which is where our SaaS platform is developed, released and supported. We receive the services of one (non-employee) consultant in Australia.

Given the nature of the service that we provide, our workforce is typically highly skilled and in permanent direct employment or they are specialised consultants. We typically recruit permanent employees who work directly for Clue in the UK with industry standard or shorter notice periods and who have the right to work in the UK. We do not employ seasonal or overseas employees, and we take reasonable steps to check that other types of services we receive (e.g. contracted cleaning services) implement the minimum wage or above for their staff. We therefore consider the risks of modern slavery and forced labour within our workforce (or in labour services we contract to receive, such as cleaning services) to be low.

Our customers are also mainly UK based, but some of our customers operate globally and/or are located outside the UK, generally in the EU, US or Australia. Our customers typically use Microsoft Azure data centres in the UK, the EU, US or Australia.

Our main sub-contractor is Microsoft Azure for hosting services. These hosting services are procured via a Microsoft UK re-seller. Microsoft Azure itself is a US entity headquartered in Washington, US, operating in the UK via a number of Microsoft UK subsidiaries.

Microsoft Azure takes a number of active steps to reduce the risk of modern slavery in its supply chain and its suppliers are contractually required to comply with its supplier code of conduct. Further information is available here: <https://cdn-dynmedia-1.microsoft.com/is/content/microsoftcorp/microsoft/msc/documents/presentations/CSR/FY22-Modern-Slavery-Human-Trafficking-Statement.pdf>.

Our remaining supply chain is mainly in the UK, the EU and we use technology providers in the US (which have been carefully assessed). These are not “high risk” regions for risks of human rights abuses. However, we assess the risk of modern slavery existing within our supply chain as being greater than within our own business.

Our executive team is responsible for identifying modern slavery and ensuring there is a satisfactory governance framework for managing modern slavery risk and other reputational matters affecting our services, people, customers and suppliers. We are committed to the elimination of slavery and human trafficking. We also expect our employees and consultants to treat each other, and those we deal with, respectfully and ethically. We do not tolerate physical violence, disrespectful behaviour, bullying or harassment.

3. OUR POLICIES

Our policies and purchasing procedure sit alongside this statement and reflect our commitment to tackling modern slavery and human trafficking, as follows:

- Whistleblowing policy
- Dignity at work policy
- Equality, diversity and inclusion policy
- Anti-fraud, corruption and bribery policy
- Purchasing procedure

These policies are reviewed at least annually.

4. DUE DILIGENCE IN OUR BUSINESS AND SUPPLY CHAINS

We are committed to responsible supply chain management, however entirely eradicating the risk of modern slavery from supply chains presents challenges to most businesses, and to us. We are fully committed to managing this risk.

We undertake due diligence and take a risk-based approach when considering new suppliers and when assessing existing suppliers. Our due diligence includes mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking and evaluating the modern slavery and human trafficking risks of each new supplier. We also check and review their commitment to behaving in a socially responsible manner when onboarding suppliers. For example, for a UK supplier falling within the scope of the Modern Slavery Act 2015, we require sight of and review their modern slavery statement and we also check the government modern slavery statement registry at <https://modern-slavery-statement-registry.service.gov.uk/>. If we become aware of modern slavery occurring without our supply chain, we will work with the supplier to implement appropriate remedial steps.

5. TRAINING

We raise awareness of modern slavery issues with employees by explaining the principles of the Modern Slavery Act 2015 and by referring to our Whistleblowing policy (for example during on-boarding), such as how employees can identify and prevent slavery and human trafficking, and what employees can do to report concerns or suspicions of potential slavery and human trafficking issues to their line managers or senior management within our company generally.

We have provided training on modern slavery issues via our learning management system platform during 2026.

Through this training and from this statement, employees are made aware that they can report modern slavery or forced labour to www.gla.gov.uk, by telephone to 0800 432 0804 (Confidential Hotline) or via email to intelligence@gla.gov.uk, or via our Whistleblowing Policy.

Our employees are also asked to acknowledge that they have read the contents of this modern slavery statement.

6. EFFECTIVENESS IN ENSURING MODERN SLAVERY IS NOT TAKING PLACE

We monitor the number of employees taking and passing the modern slavery training module.

We will record the number of modern slavery incidents reported to us or of which we become aware, and we will assess how we became aware of the incident and the remediation steps taken by Clue.

7. DOCUMENT OWNER

Role
General Counsel

8. DOCUMENT APPROVAL

Name	Role
Clare Elford	CEO
Thomas Drohan	CCO
Nick Harber	CFO

9. DOCUMENT VERSION

Version	Date	Revision	Author
V 1.0	13/04/2022	1.0 Baseline	PGI
V 1.1	20/10/2022	1.1 Updates to branding and Document owner	Helen Blacker
V2.0	08/04/2024	2024 version	Natasha Laird
V3.0	28/03/2025	2025 version	Natasha Laird
V4.0	10/07/2026	2026 version	Natasha Laird

**This statement is signed and approved on behalf of
Clue Computing Company Limited's board of
directors.**

DocuSigned by:

Nick Harber

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Nick Harber

16-Jul-26

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Company Number 01715616

Company registered in England & Wales.

**Clue helps organisations doing vitally important
work, including protecting government budgets
against fraudulent claims, disrupting human
trafficking and organised criminal gangs, and
catching cyber criminals.**

**Our customers are dealing with increasing volumes
and complexity of data to counter ever-evolving
threats.**

**We are bringing AI, automation, data insights and
more into Clue to support their work to secure
justice and prevent harm.**

**To find out more please get in touch at
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