



Clarivate Analytics Group Statement on U.K. Modern Slavery Act

This statement is made in accordance with the requirements of the United Kingdom Modern Slavery Act 2015 (“the Act”) as they apply to Clarivate Analytics (UK) Limited, and all related reporting entities in the Clarivate global structure (“Clarivate” or “the Group”). Although not all Clarivate Group reporting entities are subject to the Act, Clarivate has taken a Group-wide approach to its human rights commitment.

As part of our adherence to the highest ethical standards in all we do, Clarivate is committed to compliance with the provisions of the Act. As such, the Group has a zero-tolerance approach to modern slavery, servitude, forced or compulsory labour and human trafficking.

The Board of Camelot Holdings (Jersey) Limited (“the Board”) acknowledges the Group’s role in ensuring slavery and human trafficking are not taking place in its business or its supply chains. This statement identifies the actions that Clarivate is taking to prevent slavery and human trafficking from occurring in our business and our supply chains.

This statement is given on behalf of the Group for the financial year ending 31 December, 2018 and has been approved by the Board, who will continue to review and update it annually.

Approach to modern slavery and human rights violations

Clarivate has a zero tolerance approach to any form of modern slavery. 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 business or our supply chain. We are firmly opposed to forced labour and all forms of labour exploitation. We continually work towards minimising the risk of human rights violations.

Our business policies

We have implemented a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner, and to assist us in identifying signs of modern day slavery.

In addition, we have a Whistleblower Policy and an anonymous Hotline to encourage our employees to report concerns about any unlawful or improper conduct, including human rights violations like modern slavery. Our Whistleblower Policy ensures that issues can be raised in confidence without fear of retaliation and that all such issues will be appropriately investigated and dealt with.

Other internal policies that help prevent modern slavery include:

1. **Code of Conduct.** Our Code of Conduct is one of the cornerstones of our compliance program. It covers a broad range of topics, which all speak to the principles and values that help us build a strong culture of ethics.
2. **Supply Chain Ethical Code.** We maintain a Supply Chain Ethical Code, which promotes comparable standards of behaviour for our suppliers worldwide, thereby driving commitment to ethical improvements through our supply chain.
3. **Recruitment Policy and Procedures.** We have a robust set of policies and procedures relating to recruitment and hiring, which includes passport verification, eligibility to work in a country and criminal records check for all employees, to safeguard against human trafficking or individuals being forced to work against their will. This policy also encompasses our Immigration Policy. We have a fully transparent salary and benefits structure for all employees.
4. **Grievance, Harassment and Anti-Bullying Policy.** We operate a grievance, harassment and anti-bullying policy.
5. **Third Party Risk Management Policy and Program.** We maintain a Third Party Risk Management Policy and Program through which our partners, agents, vendors and suppliers are screened for compliance and corruption risk. We investigate any red flags identified during the sanction screening, media monitoring and due diligence processes, and will not engage with any Third Parties that do not satisfy our standards of ethical behaviour.
6. **Disciplinary Policy.** We follow a Disciplinary Policy that provides fair and consistent treatment to all employees subject to disciplinary action for misconduct.
7. **Anti-Bribery and Anti-Corruption Policy.** We operate an Anti-Bribery and Anti-Corruption Policy, which contains, among other things, strict guidelines regarding improper benefits and interactions with government officials. The policy requires transparency in our business dealings and accurate record keeping and makes clear that no one will suffer adverse consequences for reporting a potential violation.
8. **Anti-Fraud Policy.** Conducting business with honesty and integrity is one of our most important goals. To that end, we have implemented an Anti-Fraud Policy, which is aimed at preventing, detecting and deterring fraudulent acts whether committed against or on behalf of the company.

To the best of our knowledge, no Clarivate related incidents relating to slavery, servitude, forced or compulsory labour or human trafficking occurred during 2018.

Signed by a director for and on behalf of the Clarivate Group of Companies



Stephen Hartman