

Registration number: SC081670

## **Clarke Fire Protection Products Limited**

### **Annual Report and Financial Statements**

For the year ended 31 December 2021



## Clarke Fire Protection Products Limited

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<b>Directors</b>	John Blackwood Dane Petrie
<b>Company secretary</b>	Paul Loebig
<b>Registered number</b>	SC081670
<b>Registered office</b>	Unit 1 Grange Works Lomond Road Coatbridge ML5 2NN
<b>Auditor</b>	Ernst & Young LLP 5 George Square Glasgow G1 2DY
<b>Bankers</b>	The Royal Bank of Scotland plc 37 High Street Dumbarton G82 1LX
<b>Solicitors</b>	CMS Cameron McKenna LLP Saltire Court 20 Castle Terrace Edinburgh EH1 2EN

## Clarke Fire Protection Products Limited

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### Strategic Report

for the year ended 31 December 2021

The directors present their strategic report for the year ended 31 December 2021.

#### **Fair review of the business**

As we expected, all the challenges the Company experienced in 2020 with the likes of Brexit and especially Covid carried over into 2021.

During the year, priority number one was to ensure that Covid was controlled so we could keep our work force safe and our manufacturing facility open. This was done by carrying on with split shifts for factory production personnel and a working from home policy for office staff. The Company took advantage of the Government Job Retention Scheme during this time. By implementing rigorous Covid prevention measures, the Company was able to continue manufacturing throughout the global pandemic and during the year returned to full time operation at the manufacturing plant in Glasgow.

With Global markets trying to recover from the effects of Covid the good news was that we could see increased market demand for our product which in itself was very positive.

However it was evident that our biggest challenge to manufacture and deliver product to the market place would be facing us from our own supply chain. Whether they were our Engine Manufacturers or Electrical Component suppliers, their inability to supply us with the goods meant we were unable to supply our Customers and as the year went on our lead times to the market place would go out to 5 months from historic lead time in the past closer to 1 month. Thankfully our competitors were also seeing the same challenges and as such we did not lose any market share as a result.

Trying to keep control of costs was another major factor as we were experiencing exorbitant freight costs ironically with longer shipping times and general quarterly price increases from our wide range of suppliers. As a result we found ourselves having to implement 2 price increases in a calendar year.

Despite all the challenges we increased our turnover in 2021 to £ 37,531,326, £3.95m up from our 2020 figure of £33,585,409 . It was also the case that our Engine Sales in 2021 were 3,489 compared to 3,114 from 2020 - an increase of 375 engines.

Even though our 2021 turnover was up £3.95m and our engine sales up by 375 our margin decreased 1.2% from the previous year and our net profit was down £93k, entirely due to cost headwinds (gross profit margin 2020 24.4% & 2021 23.2% respectively).

To sell £4m more and be £93k down from the previous year in net profit really emphasises the increase in costs the Company was subjected to in 2021.

With all the challenges of 2021 the Board of Directors in the USA were satisfied with our performance and are understanding of the challenges facing us in 2022.

Going forward in 2022 we will see once again supply constraints, rising costs and currency fluctuations which will undoubtedly have a negative impact on our business but we are confident that the excellent workforce will meet the challenge head on once again.

## Clarke Fire Protection Products Limited

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### Strategic Report

for the year ended 31 December 2021

#### Principal risks and uncertainties

##### Competitive risks

The Company is at risk from aggressive pricing and goods delivery strategies from its competitors. The Company is focused on cost control and the delivery of high quality products to minimise the impact of this competition.

##### Legislative risks

The Company is required to comply with all relevant legislation, but in particular covering activities such as standards of health and safety of employees and employment legislation.

##### Financial risk management

The Company's financial risk management policies are determined by the Company's ultimate parent undertaking and controlling party, Clarke Power Services Inc. The Company's principal financial instruments comprise cash, short term deposits and/or borrowings, the main purpose of which is to provide finance for its normal trading operations. The Company has various other financial instruments such as trade debtors and creditors that arise directly from its trading operations.

The main risks arising from the Company's financial instruments are liquidity and foreign currency risks. The Company has clear policies for managing each of these risks.

June 8, 2022

Approved by the Board on ..... and signed on its behalf by:

DocuSigned by:

*John Blackwood*

29B451B4450E4FA:.....

John Blackwood

Director

## Clarke Fire Protection Products Limited

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### **Directors' Report**

**for the year ended 31 December 2021**

The directors present their report and the financial statements for the year ended 31 December 2021.

#### **Results and dividends**

The profit for the year, after taxation, amounted to £1,931,551 (2020: £2,024,520).

During the year the Company paid a dividend of £3,000,000 (2020: £2,000,000).

#### **Directors of the Company**

The directors who held office during the year and up to the date of approval of the financial statements were as follows:

John Blackwood

Dane Petrie

#### **Qualifying third party indemnity provisions**

The ultimate parent undertaking of the Company maintains liability and indemnity insurance for its directors and officers and for those of its subsidiaries. The provision has been in place throughout the year.

#### **Financial instruments**

Financial instruments are disclosed in the Strategic Report on page 2.

#### **Going concern**

The Company's business activities, a review of the business, together with the factors likely to affect its future developments, its financial position, financial risk management objectives and details of its financial instruments are described in the Strategic Report on page 2.

The effect of the COVID-19 pandemic is still having an impact on our business with some major suppliers now going back into a situation where the recent lockdown in China is again having an impact on their ability to supply product.

With price increases from suppliers now a monthly occurrence, coupled with increasing freight charges and rising inflation our costs are going up significantly. This has left us with no alternative but to go the market place with another price increase which will be our second in 6 months and may not be the last in 2022.

Due to these challenges our margins are decreasing in front of our eyes month to month, and as a result, the business is focussed on trying to improve this situation by going to the market place with new pricing. However, it cannot be ignored that this may be seen as high risk strategy, when our competition is attempting to undercut and gain market share from us.

Hence, we can only hope that the competition are having the same pricing pressures and they will have to follow suit with price increases. Either way we have to increase our prices to try and protect our margin as we cannot sell product that will not cover our costs.

The big challenge is that we are in a very competitive market where our competition will go for reduced gross profit to get the volume business. A market strategy that has proved successful from Clarke Scotland in gaining the market share the company enjoys.

## Clarke Fire Protection Products Limited

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### Directors' Report

for the year ended 31 December 2021

Going forward, it will get down to how we wish to compete with our competition to get the volume business. A market that Clarke Scotland has grown significantly over the last 10 years.

Due to the volatility of the global economic situation and the effects this is having on all businesses, like many companies we will find it difficult with any degree of accuracy to forecast where our profitability will be at the end of this year.

In assessing the prospects of the business for going concern purposes, the Directors have considered cashflow forecasts prepared by management for the period to June 2023. These forecasts include a base case which assumes revenue to be consistent with that achieved in 2021, based on current order book and visible pipeline. A sensitivity analysis has been prepared which reflects a severe but plausible downside scenario and includes a reduction in revenue over the forecast period and a reduction in margin arising from the potential ongoing impacts of COVID-19 & supplier availability, currency and increasing costs to the business being experienced as a result of the general global uncertainty. In making this assessment, the Directors have identified potential mitigating actions that could be taken to preserve liquidity, which include, but are not limited to, reducing future dividend payments and CAPEX. The analysis undertaken by management, combined with the actions that could be taken, allow the Directors to conclude that the Company will continue to be in a cash surplus position, and is well placed to manage its business risks successfully.

The Directors have a reasonable expectation that the Company has adequate resources to continue in operation and to meet its liabilities as they fall due in the 13 months to 30 June 2023. Accordingly, they continue to adopt the going concern basis in preparing the financial statements.


#### Disclosure of information to the auditor

So far as each person who was a director at the date of approving this report is aware, there is no relevant audit information, being information needed by the auditor in connection with preparing its report, of which the auditor is unaware. Having made enquiries of fellow directors and the Company's auditor, each director has taken all the steps that he/she is obliged to take as a director in order to make himself aware of any relevant audit information and to establish that the auditor is aware of that information.

#### Reappointment of auditor

In accordance with section 485 of the Companies Act 2006, a resolution for the re-appointment of Ernst & Young LLP as auditor of the Company is to be proposed at the forthcoming Annual General Meeting.

Approved by the Board on 08/06/22 and signed on its behalf by:

DocuSigned by:  
  
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John Blackwood  
Director

## Clarke Fire Protection Products Limited

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### **Statement of Directors' Responsibilities**

The directors acknowledge their responsibilities for preparing the Annual Report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the Company and of the profit or loss of the Company for that period. In preparing these financial statements, the directors are required to:

- select suitable accounting policies and apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the Company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the Company's transactions and disclose with reasonable accuracy at any time the financial position of the Company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the Company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

## Clarke Fire Protection Products Limited

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### **Independent Auditor's Report** to the Members of Clarke Fire Protection Products Limited

#### **Opinion**

We have audited the financial statements of Clarke Fire Protection Products Limited (the 'Company') for the year ended 31 December 2021, which comprise the Statement of Comprehensive Income, Balance Sheet, Statement of Changes in Equity, Statement of Cash Flows, and related notes 1 to 25, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- give a true and fair view of the state of the Company's affairs as at 31 December 2021 and of its profit for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

#### **Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### **Conclusions relating to going concern**

In auditing the financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of 12 months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the directors with respect to going concern are described in the relevant sections of this report. However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the Company's ability to continue as a going concern.

#### **Other information**

The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon. The directors are responsible for the other information contained within the annual report.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in this report, we do not express any form of assurance conclusion thereon.



## Clarke Fire Protection Products Limited

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### **Independent Auditor's Report** **to the Members of Clarke Fire Protection Products Limited**

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of the other information, we are required to report that fact.

We have nothing to report in this regard.

#### **Opinion on other matter prescribed by the Companies Act 2006**

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the Strategic Report and the Directors' Report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the Strategic Report and Directors' Report have been prepared in accordance with applicable legal requirements.

#### **Matters on which we are required to report by exception**

In the light of our knowledge and understanding of the Company and its environment obtained in the course of the audit, we have not identified material misstatements in the Strategic Report and the Directors' Report.

We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of directors' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit.

#### **Responsibilities of directors**

As explained more fully in the Statement of Directors' Responsibilities set out on page 6, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

## Clarke Fire Protection Products Limited

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# Independent Auditor's Report

## to the Members of Clarke Fire Protection Products Limited

### **Auditor's responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

### ***Explanation as to what extent the audit was considered capable of detecting irregularities, including fraud***

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect irregularities, including fraud. The risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below. However, the primary responsibility for the prevention and detection of fraud rests with both those charged with governance of the entity and management.

Our approach was as follows:

- We obtained an understanding of the legal and regulatory frameworks that are applicable to the Company and determined that the most significant are those that relate to the reporting framework (FRS 102 and Companies Act 2006) and the relevant tax compliance regulations in the UK and Ireland;. In addition, the Company has to comply with laws and regulations to its operations including health and safety, employees, GDPR and anti-bribery and corruption;
- We understood how Clarke Fire Protection Products Limited is complying with those frameworks by making enquiries of management and those responsible for legal and compliance procedures. We corroborated our enquires through our review of board minutes, as well as consideration of the results of our audit procedures to either corroborate or provide contrary evidence.
- We assessed the susceptibility of the company's financial statements to material misstatement, including how fraud might occur by meeting with management to understand where they considered there was susceptibility to fraud. We also considered performance targets and their influence on efforts made by management to manage earnings. Where this risk was considered higher, we performed audit procedures to address the risk of fraud in revenue recognition and the risk of fraud through management override of controls. These procedures included year end cut off testing for revenue, audit procedures that included an analysis and investigation of the relationship between revenue, receivables and cash and testing of manual journals based on specific risk criteria investigating the journals identified and agreeing them to source documentation. We also incorporated unpredictability into our testing of manual journals and our testing of revenue recognition.
- Based on this understanding we designed our audit procedures to identify non-compliance with such laws and regulations. Our procedures involved enquiries of management, reviewing the board minutes, substantively testing the legal expenses account and considering whether the results of our audit procedures might have indicated non-compliance with laws and regulations. In addition we completed procedures to conclude on the compliance of the disclosures in the financial statements with the reporting framework (FRS 102 and Companies Act 2006).

Clarke Fire Protection Products Limited

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**Independent Auditor's Report**  
**to the Members of Clarke Fire Protection Products Limited**

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at <https://www.frc.org.uk/auditorsresponsibilities>. This description forms part of our auditor's report

**Use of our report**

This report is made solely to the Company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members as a body, for our audit work, for this report, or for the opinions we have formed.

*Ernst & Young LLP*

.....  
Sharron Moran (Senior Statutory Auditor)  
For and on behalf of Ernst & Young LLP, Statutory Auditor

5 George Square  
Glasgow  
G1 2DY

Date: 08 June 2022

## Clarke Fire Protection Products Limited

## Statement of Comprehensive Income

for the year ended 31 December 2021

	<i>Note</i>	2021 £	2020 £
Turnover	3	37,531,326	33,585,409
Cost of sales		<u>(28,822,262)</u>	<u>(25,399,263)</u>
<b>Gross profit</b>		<b>8,709,064</b>	<b>8,186,146</b>
Administrative expenses		(6,330,555)	(5,877,731)
Other operating income	4	<u>24,266</u>	<u>201,546</u>
<b>Operating profit</b>	<b>5</b>	<b>2,402,775</b>	<b>2,509,961</b>
Interest receivable and similar income	8	110	2,909
Interest payable and expenses	9	<u>(6,490)</u>	<u>(6,490)</u>
<b>Profit before tax</b>		<b>2,396,395</b>	<b>2,506,380</b>
Tax on profit	10	<u>(464,844)</u>	<u>(481,860)</u>
<b>Profit for the financial year</b>		<b><u>1,931,551</u></b>	<b><u>2,024,520</u></b>

The above results were derived from continuing operations.

There were no recognised gains or losses for the 2021 or 2020 other than those included in the statement of comprehensive income.

The notes on pages 15 to 30 form an integral part of these financial statements.

## Clarke Fire Protection Products Limited


**Balance Sheet**

as at 31 December 2021

	Note	2021 £	2020 £
<b>Fixed assets</b>			
Tangible assets	12	230,076	259,736
Investments	13	<u>2</u>	<u>2</u>
		<u>230,078</u>	<u>259,738</u>
<b>Current assets</b>			
Stocks	14	7,583,080	7,519,081
Debtors	15	5,944,600	5,637,201
Cash at bank and in hand		<u>4,554,146</u>	<u>5,944,411</u>
		18,081,826	19,100,693
<b>Creditors: Amounts falling due within one year</b>	16	<u>(9,883,949)</u>	<u>(9,864,548)</u>
<b>Net current assets</b>		<u>8,197,877</u>	<u>9,236,145</u>
<b>Total assets less current liabilities</b>		<u>8,427,955</u>	<u>9,495,883</u>
<b>Creditors: Amounts falling due after more than one year</b>	17	(104,680)	(104,680)
<b>Provisions for liabilities</b>			
Deferred tax	19	<u>(14,785)</u>	<u>(14,264)</u>
<b>Net assets</b>		<u>8,308,490</u>	<u>9,376,939</u>
<b>Capital and reserves</b>			
Called up share capital	20	6,431	6,431
Share premium account	21	153,889	153,889
Capital redemption reserve	21	100,000	100,000
Profit and loss account		<u>8,048,170</u>	<u>9,116,619</u>
<b>Total shareholders funds</b>		<u>8,308,490</u>	<u>9,376,939</u>

June 8, 2022

The financial statements were approved and authorised for issue by the Board on ..... and signed on its behalf by:

DocuSigned by:  
  
 www.29BA512A456E6FA.....

John Blackwood  
 Director

The notes on pages 15 to 30 form an integral part of these financial statements.

## Clarke Fire Protection Products Limited

## Statement of Changes in Equity

for the year ended 31 December 2021

	<i>Called up share capital £</i>	<i>Share premium account £</i>	<i>Capital redemption reserve £</i>	<i>Profit and loss account £</i>	<i>Total £</i>
At 1 January 2020	6,431	153,889	100,000	9,092,099	9,352,419
Profit for the year	-	-	-	2,024,520	2,024,520
Total comprehensive income	-	-	-	2,024,520	2,024,520
Dividends	-	-	-	(2,000,000)	(2,000,000)
At 31 December 2020	6,431	153,889	100,000	9,116,619	9,376,939
Profit for the year	-	-	-	1,931,551	1,931,551
Total comprehensive income	-	-	-	1,931,551	1,931,551
Dividends	-	-	-	(3,000,000)	(3,000,000)
At 31 December 2021	6,431	153,889	100,000	8,048,170	8,308,490

The notes on pages 15 to 30 form an integral part of these financial statements.

## Clarke Fire Protection Products Limited

**Statement of Cash Flows**

for the year ended 31 December 2021

	<i>Note</i>	<i>2021</i> £	<i>2020</i> £
<b>Reconciliation of operating profit to net cash inflow from operating activities</b>			
Operating profit		2,402,775	2,509,961
Depreciation	5	113,207	112,892
(Increase)/decrease in debtors		(307,399)	2,046,285
Increase in stocks		(63,999)	(450,355)
Increase in creditors		245,861	959,329
Corporation tax paid		(690,783)	(443,035)
<b>Net cash inflow from operating activities</b>		<b>1,699,662</b>	<b>4,735,077</b>
<b>Cash flows used in investing activities</b>			
Interest received	8	110	2,909
Acquisitions of tangible assets	12	(83,547)	(73,768)
<b>Net cash flows used in investing activities</b>		<b>(83,437)</b>	<b>(70,859)</b>
<b>Cash flows used in financing activities</b>			
Interest paid	9	(6,490)	(6,490)
Equity dividend paid	11	(3,000,000)	(2,000,000)
<b>Net cash flows used in financing activities</b>		<b>(3,006,490)</b>	<b>(2,006,490)</b>
<b>Net (decrease)/increase in cash and cash equivalents</b>		<b>(1,390,265)</b>	<b>2,657,728</b>
Cash and cash equivalents at 1 January		5,944,411	3,286,683
<b>Cash and cash equivalents at 31 December</b>		<b>4,554,146</b>	<b>5,944,411</b>

The notes on pages 15 to 30 form an integral part of these financial statements.

## Clarke Fire Protection Products Limited

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# Notes to the Financial Statements

for the year ended 31 December 2021

### 1 General information

The Company is a private company limited by shares, incorporated in Scotland.

The address of its registered office is:

Unit 1  
Grange Works  
Lomond Road  
Coatbridge  
ML5 2NN  
Scotland

### 2 Accounting policies

These financial statements were prepared in accordance with Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland'.

#### ***Basis of preparation***

The financial statements have been prepared under the historical cost convention unless otherwise specified within these accounting policies and in accordance with Financial Reporting Standard 102, the Financial Reporting Standard applicable in the UK and the Republic of Ireland and the Companies Act 2006. The financial statements are prepared in sterling which is the functional currency of the Company.

The preparation of financial statements in compliance with FRS 102 requires the use of certain critical accounting estimates. It also requires management to exercise judgement in applying the Company's accounting policies.

The following principal accounting policies have been applied:

#### ***Revenue recognition***

Revenue is recognised to the extent that it is probable that the economic benefits will flow to the Company and the revenue can be reliably measured. Revenue is measured as the fair value of the consideration received or receivable, excluding discounts, rebates, value added tax and other sales taxes. The following criteria must also be met before revenue is recognised:

#### ***Sale of goods***

Revenue from the sale of goods is recognised when the significant risks and rewards of ownership of the goods have passed to the buyer, usually on dispatch of the goods, the amount of revenue can be measured reliably, it is probable that the economic benefits associated with the transaction will flow to the entity and the costs incurred or to be incurred in respect of the transaction can be measured reliably.



## Clarke Fire Protection Products Limited

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# Notes to the Financial Statements

for the year ended 31 December 2021

## 2 Accounting policies (continued)

### *Going concern*

The Company's business activities, a review of the business, together with the factors likely to affect its future developments, its financial position, financial risk management objectives and details of its financial instruments are described in the Strategic Report on page 2.

The effect of the COVID-19 pandemic is still having an impact on our business with some major suppliers now going back into a situation where the recent lockdown in China is again having an impact on their ability to supply product.

With price increases from suppliers now a monthly occurrence, coupled with increasing freight charges and rising inflation our costs are going up significantly. This has left us with no alternative but to go the market place with another price increase which will be our second in 6 months and may not be the last in 2022.

Due to these challenges our margins are decreasing in front of our eyes month to month, and as a result, the business is focussed on trying to improve this situation by going to the market place with new pricing. However, it cannot be ignored that this may be seen as high risk strategy, when our competition is attempting to undercut and gain market share from us.

Hence, we can only hope that the competition are having the same pricing pressures and they will have to follow suit with price increases. Either way we have to increase our prices to try and protect our margin as we cannot sell product that will not cover our costs.

The big challenge is that we are in a very competitive market where our competition will go for reduced gross profit to get the volume business. A market strategy that has proved successful from Clarke Scotland in gaining the market share the company enjoys.

Going forward, it will get down to how we wish to compete with our competition to get the volume business. A market that Clarke Scotland has grown significantly over the last 10 years.

Due to the volatility of the global economic situation and the effects this is having on all businesses, like many companies we will find it difficult with any degree of accuracy to forecast where our profitability will be at the end of this year.

In assessing the prospects of the business for going concern purposes, the Directors have considered cashflow forecasts prepared by management for the period to June 2023. These forecasts include a base case which assumes revenue to be consistent with that achieved in 2021, based on current order book and visible pipeline. A sensitivity analysis has been prepared which reflects a severe but plausible downside scenario and includes a reduction in revenue over the forecast period and a reduction in margin arising from the potential ongoing impacts of COVID-19 & supplier availability, currency and increasing costs to the business being experienced as a result of the general global uncertainty. In making this assessment, the Directors have identified potential mitigating actions that could be taken to preserve liquidity, which include, but are not limited to, reducing future dividend payments and CAPEX. The analysis undertaken by management, combined with the actions that could be taken, allow the Directors to conclude that the company will continue to be in a cash surplus position, and is well placed to manage its business risks successfully.

## Clarke Fire Protection Products Limited

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# Notes to the Financial Statements

for the year ended 31 December 2021

## 2 Accounting policies (continued)

The Directors have a reasonable expectation that the Company has adequate resources to continue in operation and to meet its liabilities as they fall due in the 13 months to 30 June 2023. Accordingly, they continue to adopt the going concern basis in preparing the financial statements.

### **Group financial statements**

The Company is exempt from the requirement to prepare group financial statements by virtue of section 401 of the Companies Act 2006, and accordingly the financial statements present information about the Company as an individual undertaking and not about its group.

### **Tax**

The tax expense for the year comprises current and deferred tax. Tax is recognised in the Statement of comprehensive income, except that a charge attributable to an item of income and expense recognised as other comprehensive income or to an item recognised directly in equity is also recognised in other comprehensive income or directly in equity respectively.

The current income tax charge is calculated on the basis of tax rates and laws that have been enacted or substantively enacted by the balance sheet date in the countries where the Company operates and generates income.

Deferred tax balances are recognised in respect of all timing differences that have originated but not reversed by the Balance sheet date, except that:

- The recognition of deferred tax assets is limited to the extent that it is probable that they will be recovered against the reversal of deferred tax liabilities or other future taxable profits; and
- Any deferred tax balances are reversed if and when all conditions for retaining associated tax allowances have been met.

Deferred tax balances are not recognised in respect of permanent differences except in respect of business combinations, when deferred tax is recognised on the differences between the fair values of assets acquired and the future tax deductions available for them and the differences between the fair values of liabilities acquired and the amount that will be assessed for tax. Deferred tax is determined using tax rates and laws that have been enacted or substantively enacted by the balance sheet date.

### **Pensions**

The Company operates a defined contribution pension scheme. Contributions are charged in the Statement of Comprehensive Income as they become payable in accordance with the rules of the scheme.

### **Leasing**

Rentals paid under operating leases are charged to income on a straight line basis over the term of the lease.

### **Tangible assets**

Tangible fixed assets under the cost model are stated at historical cost less accumulated depreciation and any accumulated impairment losses. Historical cost includes expenditure that is directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

### **Depreciation**

Depreciation is charged so as to allocate the cost of assets less their residual value over their estimated useful lives, using the straight line method.

## Clarke Fire Protection Products Limited

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### Notes to the Financial Statements

for the year ended 31 December 2021

#### 2 Accounting policies (continued)

<i>Asset class</i>	<i>Depreciation method and rate</i>
Leasehold improvements	over the lease term
Plant and machinery	Between 4 and 8 years
Motor vehicles	3 years

The assets' residual values, useful lives and depreciation methods are reviewed, and adjusted prospectively if appropriate, or if there is an indication of a significant change since the last reporting date.

Gains and losses on disposals are determined by comparing the proceeds with the carrying amount and are recognised in the Statement of Comprehensive Income.

#### **Research and development**

Research and development expenditure is written off to the Statement of Comprehensive Income as incurred.

#### **Stocks**

Stocks are stated at the lower of cost incurred in bringing each product to its present location and condition and net realisable value as follows:

Raw materials and goods for resale – purchase cost on a first in, first out basis

Work in progress and finished goods – cost of direct materials and labour plus attributable overheads based on a normal level of activity

Net realisable value is based on estimated selling price less any further costs expected to be incurred to completion and disposal.

#### **Foreign currency**

Transactions in foreign currencies are recorded at the rate ruling at the date of the transaction.

Monetary assets and liabilities denominated in foreign currencies are retranslated at the rate of exchange ruling at the balance sheet date.

All differences are taken to the Statement of Comprehensive Income.

#### **Dividends**

Equity dividends are recognised when they become legally payable. Interim equity dividends are recognised when paid. Final equity dividends are recognised when approved by the shareholders at an annual general meeting.

#### **Trade debtors**

Trade debtors are amounts due from customers for merchandise sold in the ordinary course of business.

Trade debtors are recognised initially at the transaction price. A provision for the impairment of trade debtors is established when there is objective evidence that the Company will not be able to collect all amounts due according to the original terms of the receivables.

## Clarke Fire Protection Products Limited

**Notes to the Financial Statements**

for the year ended 31 December 2021

**2 Accounting policies (continued)****Trade creditors**

Trade creditors are obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Accounts payable are classified as current liabilities if the Company does not have an unconditional right, at the end of the reporting period, to defer settlement of the creditor for at least twelve months after the reporting date. If there is an unconditional right to defer settlement for at least twelve months after the reporting date, they are presented as non-current liabilities.

Trade creditors are recognised initially at the transaction price and subsequently measured at amortised cost.

**Share capital**

Ordinary shares are classified as equity. Equity instruments are measured at the fair value of the cash or other resources received or receivable, net of the direct costs of issuing the equity instruments. If payment is deferred and the time value of money is material, the initial measurement is on a present value basis.

**Government grants**

The Company receives employment-related grants from the government. A grant is recognised in the Statement of Total Comprehensive Income when there is reasonable assurance that the Company will comply with its conditions and that the grant will be received. Grants are presented in the Statement of Comprehensive Income as other operating income relating to grants claimed through the government's Coronavirus Job Retention Scheme.

**3 Turnover**

Turnover, which is stated net of value added tax, represents amounts invoiced to third parties and is attributable to one continuing activity of manufacture of bespoke fire protection systems, as stated in the directors' report.

Analysis of turnover by country of destination:

	2021 £	2020 £
UK	6,217,182	5,832,081
USA	-	324
Europe	25,264,053	21,127,255
Rest of world	6,050,091	6,625,749
	<u>37,531,326</u>	<u>33,585,409</u>

## Clarke Fire Protection Products Limited

## Notes to the Financial Statements

for the year ended 31 December 2021

### 4 Other operating income

The analysis of the Company's other operating income for the year is as follows:

	2021 £	2020 £
Government grants	<u>24,266</u>	<u>201,546</u>

### 5 Operating profit

Arrived at after charging

	2021 £	2020 £
Auditor's remuneration - audit services	29,500	33,000
Auditor's remuneration - non-audit services (tax compliance)	15,450	12,265
Auditor's remuneration - non audit services (accounts preparation)	6,500	7,440
Depreciation of tangible fixed assets	113,207	112,892
Research and development cost	2,138	6,680
Operating lease expense - land and buildings	135,000	112,500
Operating lease expense - plant and machinery	7,033	7,438
Net exchange loss/(gain) on trading activities	<u>354,983</u>	<u>(92,062)</u>

### 6 Staff costs

The aggregate payroll costs (including directors' remuneration) were as follows:

		2021 £	2020 £
	<i>Note</i>		
Wages and salaries		2,485,462	2,198,622
Social security costs		255,551	234,655
Pension costs, defined contribution scheme	22	<u>105,752</u>	<u>97,357</u>
		<u>2,846,765</u>	<u>2,530,634</u>

## Clarke Fire Protection Products Limited

**Notes to the Financial Statements**

for the year ended 31 December 2021

**6 Staff costs (continued)**

The average number of persons employed by the Company (including directors) during the year, analysed by category was as follows:

	<i>2021</i> <i>No.</i>	<i>2020</i> <i>No.</i>
Administration	31	31
Manufacturing	39	43
	<u>70</u>	<u>74</u>

**7 Directors' remuneration**

The directors' remuneration for the year was as follows:

	<i>2021</i> <i>£</i>	<i>2020</i> <i>£</i>
Directors' emoluments	180,578	164,074
Directors' pension costs	7,549	6,604
	<u>188,127</u>	<u>170,678</u>

Key management personnel is deemed as directors of the company.

The number of directors for whom retirement benefits are accruing under defined contribution schemes amounted to 1 (2020- 1).

**8 Interest receivable and similar income**

	<i>2021</i> <i>£</i>	<i>2020</i> <i>£</i>
Bank interest received	<u>110</u>	<u>2,909</u>

**9 Interest payable and expenses**

	<i>2021</i> <i>£</i>	<i>2020</i> <i>£</i>
3% preference dividend	<u>6,490</u>	<u>6,490</u>

## Clarke Fire Protection Products Limited

## Notes to the Financial Statements

for the year ended 31 December 2021

### 10 Taxation

Tax charged in the Statement of Comprehensive Income

	2021 £	2020 £
<b>Current taxation</b>		
Current tax on profits for the year	463,090	484,523
Adjustments in respect of previous periods	1,233	(9,214)
	<u>464,323</u>	<u>475,309</u>
<b>Deferred taxation</b>		
Origination and reversal of timing differences	(4,140)	(3,570)
Changes to tax rates	3,549	1,877
Adjustments in respect of prior periods	1,112	8,244
Total deferred taxation	<u>521</u>	<u>6,551</u>
Tax expense in the Statement of Comprehensive Income	<u>464,844</u>	<u>481,860</u>

The tax on profit for the year is higher than the standard rate of corporation tax in the UK (2020 - higher than the standard rate of corporation tax in the UK) of 19% (2020 - 19%).

## Clarke Fire Protection Products Limited

## Notes to the Financial Statements

for the year ended 31 December 2021

### 10 Taxation (continued)

The differences are reconciled below:

	2021 £	2020 £
Profit before tax	<u>2,396,395</u>	<u>2,506,380</u>
Corporation tax at standard rate	455,315	476,212
Expenses not deductible	5,544	8,080
Adjustments from previous periods	670	(4,309)
Tax rate changes	3,549	1,877
Income not taxable	<u>(234)</u>	<u>-</u>
Total tax charge	<u>464,844</u>	<u>481,860</u>

Deferred tax is currently recognised at 19%. On 24 May 2021, a budget announcement made by the UK government was substantively enacted to increase the rate of corporation tax from 19% to 25% from April 2023 on profits over £250,000, as per the Finance Bill 2021.

### 11 Dividends

	2021 £	2020 £
Dividend paid	<u>3,000,000</u>	<u>2,000,000</u>



## Clarke Fire Protection Products Limited

**Notes to the Financial Statements**

for the year ended 31 December 2021

**12 Tangible assets**

	<i>Leasehold improvements</i> £	<i>Plant and machinery</i> £	<i>Motor vehicles</i> £	<i>Total</i> £
<b>Cost or valuation</b>				
At 1 January 2021	756,359	1,038,273	11,272	1,805,904
Additions	<u>57,925</u>	<u>25,622</u>	<u>-</u>	<u>83,547</u>
At 31 December 2021	<u>814,284</u>	<u>1,063,895</u>	<u>11,272</u>	<u>1,889,451</u>
<b>Depreciation</b>				
At 1 January 2021	603,681	931,215	11,272	1,546,168
Charge for the year	<u>54,280</u>	<u>58,927</u>	<u>-</u>	<u>113,207</u>
At 31 December 2021	<u>657,961</u>	<u>990,142</u>	<u>11,272</u>	<u>1,659,375</u>
<b>Carrying amount</b>				
As at 31 December 2021	<u>156,323</u>	<u>73,753</u>	<u>-</u>	<u>230,076</u>
At 31 December 2020	<u>152,678</u>	<u>107,058</u>	<u>-</u>	<u>259,736</u>

**13 Investments**

	<i>2021</i> £	<i>2020</i> £
Investments in subsidiaries	<u>2</u>	<u>2</u>

The Company owns 100% of the ordinary share capital of Firedriver Diesel Engines Limited. Firedriver Diesel Engines Limited is a dormant Company registered in Scotland and its registered address is Unit 1, Grange Works, Lomond Road, Coatbridge, ML5 2NN.

## Clarke Fire Protection Products Limited

**Notes to the Financial Statements**

for the year ended 31 December 2021

**14 Stocks**

	2021 £	2020 £
Raw materials and consumables	6,903,431	6,768,429
Work in progress	572,889	291,885
Finished goods	<u>106,760</u>	<u>458,767</u>
	<u>7,583,080</u>	<u>7,519,081</u>

The difference between purchase price or production cost of stocks and their replacement cost is not material.

**15 Debtors**

	2021 £	2020 £
	<i>Note</i>	
Trade debtors	5,481,977	4,950,842
Amounts owed by group undertakings	24      202,024	202,024
Other debtors	<u>260,599</u>	<u>484,335</u>
	<u>5,944,600</u>	<u>5,637,201</u>

Amounts owed by group undertakings are interest free and repayable on demand.

## Clarke Fire Protection Products Limited

**Notes to the Financial Statements**

for the year ended 31 December 2021

**16 Creditors: Amounts falling due within one year**

	<i>Note</i>	<i>2021</i> £	<i>2020</i> £
Trade creditors		5,544,308	5,380,454
Amounts due to group undertakings	24	1,317,066	2,215,764
Corporation tax		25,846	252,306
Other taxation and social security		104,393	25,493
Other creditors		149,756	124,838
Accruals and deferred income		2,742,580	1,865,693
		<u>9,883,949</u>	<u>9,864,548</u>

Amounts owed to group undertakings are interest free and repayable on demand.

**17 Creditors: Due after more than one year**

	<i>2021</i> £	<i>2020</i> £
Preference shares	<u>104,680</u>	<u>104,680</u>

In both years the preference shares are £0.10 each and there are 1,046,799 shares.

The preference shares, which were issued at par, carry a final dividend of 3% above base rate per annum, payable half yearly in arrears on 30 June and 31 December. The dividend rights are cumulative.

The preference shares carry no votes at general meetings unless the dividend thereon is three months or more in arrears, in which event each holder will be entitled to ten votes per 10p share on a poll.

On a winding up of the Company, the preference shareholders have a right to receive, in preference to any payments to the ordinary shareholders, 10p per share plus any arrears, deficiency or accruals of fixed dividend. The preference dividend of £6,490 was paid in the year (2020 - £6,490).

## Clarke Fire Protection Products Limited

**Notes to the Financial Statements**

for the year ended 31 December 2021

**18 Financial instruments**

	2021 £	2020 £
<b>Financial assets</b>		
Financial assets that are equity instruments measured at cost less impairment	2	2
Financial assets that are debt instruments measured at amortised cost - debtors	5,742,576	5,435,177
Amounts owed by group undertakings	<u>202,024</u>	<u>202,024</u>
	<u>5,944,602</u>	<u>5,637,203</u>
<b>Financial liabilities</b>		
Financial liabilities measured as amortised cost - liability component of preference shares	104,680	104,680
Financial liabilities measured at amortised cost - trade and other creditors	5,694,065	5,505,292
Financial liabilities measured at amortised cost - accruals	2,742,580	1,865,693
Amounts owed to group undertakings	<u>1,317,066</u>	<u>2,215,764</u>
	<u>9,858,391</u>	<u>9,691,429</u>

**19 Deferred tax**

	<i>Deferred tax</i> £
At 1 January 2021	(14,264)
Adjustment in respect of prior periods	(1,112)
Credited in Statement of Comprehensive Income	<u>591</u>
At 31 December 2021	<u>(14,785)</u>

## Clarke Fire Protection Products Limited

**Notes to the Financial Statements**

for the year ended 31 December 2021

**19 Deferred tax (continued)**

The provision for deferred taxation is made up as follows:

	2021 £	2020 £
Fixed asset timing differences	(45,165)	(35,020)
Short term timing differences - trading	<u>30,380</u>	<u>20,756</u>
	<u>(14,785)</u>	<u>(14,264)</u>

**20 Share capital*****Shares classified as equity - Allotted, called up and fully paid***

	2021 No.	2021 £	2020 No.	2020 £
Ordinary shares of £0.10 each	<u>64,313</u>	<u>6,431</u>	<u>64,313</u>	<u>6,431</u>

***Allotted, called up and fully paid shares***

	2021 No.	2021 £	2020 No.	2020 £
Preference shares of £0.10 each	<u>1,046,799</u>	<u>£104,680</u>	<u>1,046,799</u>	<u>£104,680</u>

**21 Reserves*****Share premium account***

This reserve records the amount above the nominal value received for shares issued, less transaction costs.

***Capital redemption reserve***

This reserve relates to the nominal value of shares repurchased by the Company.

**22 Pension and other schemes**

The Company operates a defined contribution pension scheme. The assets of the scheme are held separately from those of the Company in an independently administered fund. The pensions cost charge (note 6) represents contributions payable by the Company to the fund and amounted to £105,752 (2020 - £97,357). The unpaid contributions outstanding at the year end were £17,232 (2020 - £14,112).

## Clarke Fire Protection Products Limited

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### Notes to the Financial Statements

for the year ended 31 December 2021

#### 23 Obligations under operating leases

The Company had future minimum lease payments under operating leases as follows:

	2021 £	2020 £
<b>Land and buildings</b>		
Not later than one year	142,500	165,000
Later than one year and not later than five years	<u>540,000</u>	<u>325,000</u>
	<u>682,500</u>	<u>490,000</u>
	2021 £	2020 £
<b>Other</b>		
Not later than one year	6,153	5,950
Later than one year and not later than five years	<u>19,776</u>	<u>18,666</u>
	<u>25,929</u>	<u>24,616</u>

#### 24 Related party transactions

During the year the Company entered into transactions, in the ordinary course of business, with other related parties. The transactions entered into, and trading balances outstanding at 31 December 2021, are as follows:

	<i>Sales to related party</i> £	<i>Purchases from related party</i> £	<i>Amounts owed from related party</i> £	<i>Amounts owed to related party</i> £
<b>Clarke Fire Protection Products Inc. Parent undertaking</b>				
2021	364,707	8,788,051	206,832	3,131,102
2020	<u>209,307</u>	<u>7,583,369</u>	<u>202,024</u>	<u>2,215,764</u>

Clarke Fire Protection Products Limited

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## **Notes to the Financial Statements**

**for the year ended 31 December 2021**

### **25 Ultimate parent undertaking and controlling party**

The Company is a wholly owned subsidiary of Clarke Fire Protection Products Inc. which is in turn wholly owned by Clarke Power Services Inc, both companies being incorporated in the United States of America. In the opinion of the directors, Clarke Power Services Inc. is the Company's ultimate parent undertaking and controlling party. Copies of their group financial statements, which include the Company, are available from 3133 East Kemper Road, Cincinnati, Ohio, 45241 USA.

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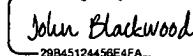
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The Tool is a vendor product which will allow electronic signature of internal and external documents. The Tool provides a global standard for an electronic signature that increases efficiency of e-Signature for the enterprise, improve document signing process for internal and external clients and allow for integrations with other 3rd party tools. The intention is for the tool to be used across all service lines within EY with the aim to ultimately replace physical signatures with electronic signatures.

Your personal data processed in the Tool is used as follows:

- You will log into the Tool by going to the DocuSign website and using Single Sign-On. Once you have logged into the Tool, you can create an envelope which contains the relevant documents. In order to create an envelope, your first name, last name and email address is used. The EY signatory uses DocuSign to sign the document (which involves the processing of their first name, last name and signature) and this is then sent to the counterparty (i.e. future employee, vendor, client etc.) to provide any requested information and signature.

EY relies on the following basis to legitimize the processing of your personal data in the Tool:

- Processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. The specific legitimate interest(s) pursued is to streamline and speed up the signature process to ensure timely executions of documents.

The provision of your personal data to EY is optional. However, if you do not provide all or part of your personal data, we may be unable to carry out the purposes for processing.

Processing of your personal data is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. The specific legitimate interest is to streamline and speed up the signature process to ensure timely executions of documents.

#### 4. What type of personal data is processed in the Tool?

The Tool processes these personal data categories:

- First and last name;
- Email address; and
- Signature.

This data is sourced from:

- Directly from you;
- Directly from any other EY partner, employee and/or contractor, former EY partner, employee and/or contractor;
- directly from clients and former clients;
- directly from vendors and former vendors; and
- directly from any other third parties who will be a party to the document which is being signed.

#### 5. Sensitive Personal Data

Sensitive personal data reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation.

EY does not intentionally collect any sensitive personal data from you via the Tool. The Tool's intention is not to process such information.

#### 6. Who can access your information?

Your personal data is accessed in the Tool by the following persons/teams:

- DocuSign Organisation Administrator;
- DocuSign Account Administrator;
- DocuSign Sender;
- DocuSign Viewer; and
- DocuSign support.

Role	Where are they located?	What is the purpose for which they need access?	Level of access rights
DocuSign Organisation Administrator	This is limited to members of the EY DocuSign Centre of Excellence (COE).	Overall admin of EY DocuSign Organization. Control	Full Admin control, with oversight of all accounts within the EY DocuSign Organization.

		Organization-wide settings and access.  Act as Account Admin on all Accounts for setup and escalation purposes.	
DocuSign Account Administrator	Multiple administrators although limited to only those who need and have been authorised to have admin rights.	To admin the account including setting up users in the system to create envelopes, reporting etc.	Admin rights to change account settings, add users but can't access envelopes unless they are given permission by envelope creator.
DocuSign Sender	Globally.	Create envelopes.	Only to their envelopes.
DocuSign support	DocuSign support is located in US and Europe.	All on the understanding that it would only be to perform support services as requested by IT.	All on the understanding that it would only be to perform support services as requested by IT.

The access rights detailed above involves transferring personal data in various jurisdictions (including jurisdictions outside the European Union) in which EY operates (EY office locations are listed at [www.ey.com/ourlocations](http://www.ey.com/ourlocations)). EY will process your personal data in the Tool in accordance with applicable law and professional regulations in your jurisdiction. Transfers of personal data within the EY network are governed by EY's Binding Corporate Rules ([https://www.ey.com/en\\_gl/data-protection-binding-corporate-rules-program](https://www.ey.com/en_gl/data-protection-binding-corporate-rules-program)).

## 7. Data retention

Our policy is to retain personal data only for as long as it is needed for the purposes described in the section "Why do we need your personal data". Retention periods vary in different jurisdictions and are set in accordance with local regulatory and professional retention requirements.

In order to meet our professional and legal requirements, to establish, exercise or defend our legal rights and for archiving and historical purposes, we need to retain information for significant periods of time.

The policies and/or procedures for the retention of personal data in the Tool are in accordance with EY Records Retention Global Policy and applicable EY Global, Area, Region or Country Retention Schedule. For more information on the retention period applicable to your personal data, please contact your usual EY representative. However, the account managers for each envelope can set their own retention periods, which can be anything between one day and seven

years. If the account managers do not set a customized retention period for their envelopes, then the EY Records Retention Global Policy retention period shall apply.

Your personal data will be retained in compliance with privacy laws and regulations.

After the end of the data retention period, your personal data will be deleted.

## **8. Security**

EY protects the confidentiality and security of information it obtains in the course of its business. Access to such information is limited, and policies and procedures are in place that are designed to safeguard the information from loss, misuse and improper disclosure. Additional information regarding our approach to data protection and information security is available in our [Protecting your data](#) brochure.

## **9. Controlling your personal data**

EY will not transfer your personal data to third parties (other than any external parties referred to in section 6 above) unless we have your permission or are required by law to do so.

You are legally entitled to request details of EY's personal data about you.

To confirm whether your personal data is processed in the Tool or to access your personal data in the Tool or (where applicable) to withdraw your consent, contact your usual EY representative or email your request to [global.data.protection@ey.com](mailto:global.data.protection@ey.com).

## **10. Rectification, erasure, restriction of processing or data portability**

You can confirm your personal data is accurate and current. You can request rectification, erasure, restriction of processing or a readily portable copy of your personal data by contacting your usual EY representative or by sending an e-mail to [global.data.protection@ey.com](mailto:global.data.protection@ey.com).

## **11. Complaints**

If you are concerned about an alleged breach of privacy law or any other regulation, contact EY's Global Privacy Leader, Office of the General Counsel, 6 More London Place, London, SE1 2DA, United Kingdom or via email at [global.data.protection@ey.com](mailto:global.data.protection@ey.com) or via your usual EY representative. An EY Privacy Leader will investigate your complaint and provide information about how it will be handled and resolved.

If you are not satisfied with how EY resolved your complaint, you have the right to complain to your country's data protection authority. You can also refer the matter to a court of competent jurisdiction.

Certain EY member firms in countries outside the European Union (EU) have appointed a representative in the EU to act on their behalf if, and when, they undertake data processing



activities to which the EU General Data Protection Regulation (GDPR) applies. Further information and the contact details of these representatives are available [here](#).

## **12. Contact us**

If you have additional questions or concerns, contact your usual EY representative or email [global.data.protection@ey.com](mailto:global.data.protection@ey.com).