

Modern Slavery and Human Trafficking Policy

Purpose

Camida is committed to preventing and combating modern slavery and human trafficking in all its forms. This policy outlines its commitment to identifying, addressing, and preventing any involvement in such practices within its operations and supply chains.

Scope

This policy is applicable to all Camida employees and extends to any business partner within its supply chain.

Responsibility

The overall responsibility for compliance with this policy lies with Camida. The Board has delegated the implementation and effective operation of controls to ensure compliance with this policy to the Camida Operations Management Team.

Policy Statement

1. **Compliance with Laws:** Camida will comply with all relevant laws and regulations related to modern slavery and human trafficking as detailed in the “References” section.
2. **Risk Assessment:** Camida will conduct bi-annual risk assessments to identify and evaluate the risk of modern slavery and human trafficking within its business operations and supply chains.
3. **Supply Chain Due Diligence:** Camida will implement due diligence procedures to assess and mitigate the risk of modern slavery in its supply chains. This includes assessing the practices of suppliers and taking appropriate actions to address identified risks.
4. **Supplier Engagement:** Camida will work collaboratively with its suppliers to promote ethical business practices. The minimum requirements expected from suppliers is outlined within the Camida Code of Conduct. This will be implemented in line with Camida Vendor Assessment.
5. **Employee Awareness and Training:** Camida will provide training to employees to raise awareness about modern slavery and human trafficking, equipping them to identify and report any concerns as per the Whistleblower Policy. This training is conducted during the induction process. Retraining may take place at Camida’s discretion.
6. **Reporting Mechanisms:** Camida will establish clear and accessible reporting mechanisms for employees and other stakeholders to report concerns related to modern slavery and human trafficking. This is described in the company Whistleblower Policy.
7. **Investigation and Remediation:** If concerns or allegations arise, Camida will promptly investigate and take appropriate remedial actions.
8. **Continuous Improvement:** Camida is committed to continuous improvement of its policies and procedures to combat modern slavery and human trafficking. Camida will regularly review and update its approach to align with best practices. Camida will work with its suppliers to encourage and support improvements to their labour and human rights procedures.

9. **Transparency and Communication:** Camida will communicate its efforts to prevent modern slavery and human trafficking both internally and externally, fostering transparency and accountability. Management will report any findings to the Board bi-annually. This policy is available for review on the company website.
10. **Board and Management Oversight:** The board of directors and executive leadership will provide oversight to ensure the effective implementation of this policy and the company's commitment to eradicating modern slavery and human trafficking.

Communication

This policy will be communicated to all employees, suppliers, and stakeholders associated with Camida. It will be reviewed annually or as needed to ensure its continued effectiveness. The current effective policy will be available for review on the Camida website.

Breaches of the Policy

Any employee found in breach of this policy will face disciplinary action, up to and including dismissal. Camida may terminate its relationship with individuals and organisations if, following a thorough investigation, it is found that a breach has occurred with this policy.

Related Policies

Camida operate several policies which reflect its objective to act ethically and in accordance with its legal and regulatory obligations to include but not limited to its employees, suppliers and customers.

- Whistleblower Policy
- Bribery and Corruption Policy
- Bullying Harassment Policy
- Disciplinary Policy
- Responsible Sourcing Policy
- Supplier Code of Conduct
- Responsible Business Policy

References

DIRECTIVE 2011/36/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims and replacing Council Framework Decision 2002/629/JHA.

CRIMINAL LAW (HUMAN TRAFFICKING) (AMENDMENT) ACT 2013

UK Modern Slavery Act 2015

Signed:



David Anchell
Chief Executive Officer

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