

CAMMACK AND WILCOX LIMITED (CW).  
MASTER INTERNAL MODERN SLAVERY POLICY.

SCOPE-

At time of production business is made directly between CW and supplier/s, policy is accurate although some content may alter and may not be captured prior to next planned review date. In such instances updated procedures are in place/being followed, just not yet documented.

Policy is to be applied at all times as far as reasonably practicable and shall refer to all persons regardless of age, race, culture, belief, religion, disability, gender identity/surgery or sexuality.

The following below terms and definitions shall be applied, referred to and used throughout policy:-	
CW	<i>Cammack and Wilcox Limited / Company / Internal.</i>
POLICY	<i>Includes all relating content, legal and internal standards. To be applied throughout and in all business instances and aspects. , supply chain and procurement instances. Content, procedures and processes.</i>
BUSINESS	<i>Potential and existing trading relationships, agreements, arrangements, actions and contracts.</i>
SLAVERY	<i>Unfair exploitation, risk and/or danger (e.g. modern, child and adult involvement).</i>
<b>FORCED LABOUR</b>	
SUPPLIER	<i>New, potential and existing third party companies, manufactures and businesses.</i>
EHS COORDINATOR	<i>Environmental, Health and Safety. Jasmine Adams.</i>
RISK	<i>'Safe' &gt;Potential risk/s deemed tolerable. Approved Supplier.</i>
RATINGS	<i>'Unsafe' &gt;Potential risk/s deemed intolerable. Supplier not approved.</i>
SUPPLIER REGISTER	<i>Excel document listing all authorised 'Approved Suppliers' used for business purposes.</i>

AIMS –

- >Research and apply legal standards, law/s, legislation and guidance (*as a minimum*).
- >Produce and implement effective internal controls to safeguard, reduce and eliminate instances, dangers and risks of slavery, exploitation and forced labour to others.
- >Engage, recruit and purchase in a legal, ethical and correct manner with third party supplier/s.
- >Source and use locally based, UK companies, brands and products.
- >Work towards continuous ethical improvement throughout CW.

PROCEDURE/S-

Healthy, clean and ethical working conditions should be provided, supported and encouraged for all per persons in all working environments.

CW do not maintain a goods, materials or direct-labour supply chain Framework.

Employees are not required to conduct overnight away business (*from CW office/yard depot*) that requires the need for overnight hotel accommodation.

General reliance is placed upon the Crown Commercial Service (CCS) and government procured supply chains for all consumable goods and operational services. Over a 12 month duration CW will procure NIL goods or services through CCS.

SUPPLIER RISK ASSESSMENT/S-

Electronically issued to supplier as soon as possible with full completion and return requested within 7 calendar days (*of issue*). EHS Coordinator to review accordingly completed supplier assessments within 7 calendar days (*of return*). Provided answers that determine the applied relating risk ratings shall result in

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supplier approval where 'Safe' risk rating is applied. 'Unsafe' risk rating results terminate supplier approval processes with immediate effect.

CW reserve the right to (*and shall*) cease and terminate all business seeking to recover incurred losses.

APPROVED SUPPLIERS-

CW currently have around 65 separate independent UK based suppliers and do not conduct overseas business. Estimated annual procurement spend is in the region of £1,650,000.

'Approved Supplier' status is checked and maintained accordingly via risk assessment renewals, 'Safe' risk rating results must be achieved in all instances to ensure continuation of business relations, where not the above procedures are followed.

SUPPLIER NON-COMPLIANCES-

All unacceptable practice instances to be internally investigated and actioned accordingly with supplier business to be suspended during such instances. Non-compliance findings to be reported and escalated to relevant external enforcing body where required.

Suppliers convicted of legislation breaches will be removed from the 'Supplier Register' immediately and no further business shall take place.

Supplier risk assessment renewal process completion may be required even if no charges or convictions are brought to supplier.

CW shall comply, assist and share as required, requested and in accordance with data protection legislation and internal data protection policy content and procedures. Proven non-compliances result in serious and severe punishments (*e.g. life imprisonment*).

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