

CAMMACK AND WILCOX LIMITED.

Master Internal Modern Slavery Policy.

POLICY-

This policy shall refer and comply with the 'Modern Slavery Act 2015'. Cammack and Wilcox Limited (CW) shall always apply this policy (as far as reasonably practicable). It shall refer to all persons regardless of age, race, culture, belief, religion, disability, gender identity or sexuality.

At time of production policy content is accurate, in instances where updated procedures have not been documented prior to next planned review, updated procedures shall apply.

CW Director has overall and final authority and responsibility in relation to all policy content, day to day management is assigned to CW EHS Coordinator.

Non-compliances will be investigated, managed and actioned accordingly. Employment contracts and terms shall be terminated immediately in all instances of gross misconduct. Illegal and criminal behaviours will be reported accordingly to relevant enforcing bodies with such behaviours being actioned as required (e.g. imprisonment).

AIMS-

(As far as reasonably practicable), CW shall aim to: -

- > Research and apply modern slavery legal standards, laws and legislation (as minimum).
- > Banish modern slavery exploitation and forced labour practices to all persons.
- > Engage, recruit and purchase in a legal, ethical and correct manner with suppliers.
- > Source and use local/UK based companies, brands and products (where possible).
- > To be reviewed annually (as per Achilles Audit requirement).

SCOPE-

For the purposes of this policy the below terms and definitions shall be used and applied: -

TERMS	DEFINITIONS
BUSINESS	Potential and existing trading relationships, agreements, arrangements, actions and contracts.
SLAVERY	Unfair exploitation, risk and/or danger (e.g. modern, child and adult involvement).
SUPPLIER	New, potential and existing third-party companies, manufactures and businesses.
RISK RATINGS	'Safe' > Potential risk/s deemed tolerable. Approved Supplier.
	'Unsafe' > Potential risk/s deemed intolerable. Supplier not approved.
SUPPLIER REGISTER	Excel document listing all authorised 'Approved Suppliers' used for business purposes.

At time of production business is made directly between CW and suppliers

CW do not maintain a goods, materials or direct-labour supply chain Framework. Personnel do not conduct work that requires 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.

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.

PROCEDURES-

> Electronic risk assessment (RA) issued (to suppliers), request completion/return within 7 calendar days. Returned RA reviewed to apply risk rating of safe or unsafe. In instances of unsafe risk rating supplier shall not be used and terminated with immediate effect. CW reserve the right to cease and terminate all business in instances of unsafe risk rating. Where a safe risk rating is determined, supplier to be added

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to internal approved supplier register and used for business purposes and purchases. Approved suppliers shall be issued with RA on an annual basis.

> Reported, suspected and actual instances of unacceptable practice shall be internally investigated and actioned accordingly. Working relationships and contracts may be suspended during these times. Non-compliance findings to be reported and escalated to relevant external enforcing body where required. Suppliers found to be in breach of required CW requirements shall be removed from internal approved supplier register immediately and no further business shall take place. Supplier RA renewal may be required even if no charges or convictions are brought to supplier. Suppliers found to be in breach of legal requirements and criminal behaviours shall be reported to relevant enforcing parties immediately.

POLICY STATEMENT SIGN OFF DETAILS			
As the Director/Owner of Cammack and Wilcox Limited, I date, print and sign below to confirm authorisation for this Modern Slavery Policy and all content to be issued and communicated (as required) to all relevant and necessary personnel. Updates and reviews will take place as planned unless circumstances require before.			
Dated:	July 2022		
Printed:	Paul Cammack	Position:	Director
Signed:			