

Modern Slavery Transparency Statement 2023

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1. Introduction

Camira's sixth Modern Slavery Transparency Statement outlines the steps we take as a business to prevent slavery and human trafficking in our own operations and supply chains. Modern Slavery continues to grow as a global issue, and we understand our responsibility to prevent, mitigate and remediate where necessary, the risks of human trafficking, forced, bonded and child labour and to respect human rights in our operations and our supply chains. Our commitment to our customers and stakeholders is very clear; we will always treat people in our business and supply chain fairly. We continuously review and improve our practices to ensure that we have the most effective responses to prevent and remediate any negative impact on human rights.

2. Our business

As a global organisation, Camira provides turnkey textile products into the commercial interior and mass passenger transportation markets. Our products grace some of the most prestigious installations of blue-chip headquarters, indoor arena and cinemas, healthcare and education settings, and transportation interiors of mainline trains, underground trains, public buses, and coaches.

Headquartered and primarily based in West Yorkshire (UK), Camira Group Holdings Limited continues to lead a dynamic group of companies currently selling into over 70 countries from 16 locations, employing over 600 people. Our product supply chains are global, utilising more than 600 suppliers. We have three primary groups of suppliers: (1) textile raw materials, (2) chemicals, (3) operating products and services.

3. Governance

Camira's Board of Directors retain ultimate accountability for Group strategy, policy, governance, and risk management of modern slavery issues. Responsibility for the practical implementation of modern slavery risk mitigation activity is undertaken by our Human Resource, Strategic Purchasing, Sustainability and Compliance teams who consult and work with nominated employee representatives, internationally, nationally, and locally.

4. Policies and controls

Underpinning our commitment to Making the Difference, we recognise our potential to influence the safeguarding of our international, national, and local communities. It is one of our guiding principles to build and maintain the highest standards amongst our suppliers and take practical steps to guard against exploitation of workers, forced labour, harassment, intimidation and human trafficking. Equally, Camira is focused on providing a working environment in which our People can thrive. Our suite of people-related strategies and policies ensure that integrity is ingrained as a core value, and annual delivery of our specialist modern slavery training validates our shared understanding of our compliance culture. It is the responsibility of all our People to adhere to the strategies, policies and training provided, in addition to any specific local requirements. Policies and controls relevant to Modern Slavery include:

- **Group Compliance Policy**
- **Corporate Social Responsibility Policy**
- **Group Health & Safety Policy**
- **Supplier Code of Conduct**
- **Whistleblowing Policy & Procedures**

Our strategies, policies and controls are shared with our supply chain partners through our Supplier Assessment Framework and are made available through our corporate website and intranet.

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5. Risk Management

Camira's approach to identifying and assessing modern slavery risk is embedded within our Group risk management practices. Businesses and functions governed by this statement are contractually required to conform to Camira's control requirements including active diligence in the identification and notification of modern slavery risks. Our supply chain partners are additionally contractually obligated to mitigate modern slavery risks with their supply chain partners. We have considered the exposure of Camira to modern slavery risk, taking into account the nature of our business activities, the application of group policies, and particularly our purchasing and recruitment practices. Overall, we consider the Group's exposure to Modern Slavery to be low.

In 2022 the following countries were prioritised as the highest risk areas in our supply chain for Modern Slavery:

- China
- India
- Pakistan
- Sri Lanka

6. Tackling modern slavery risk in our supply chain

The management of modern slavery risk and impact in our supply chain is embedded into our Supplier Assessment Framework. Supported by our Strategic Purchasing team, our supply chain is responsible for ensuring compliance with local labour laws. We assess the modern slavery risk to people in our supply chain by considering the country of origin we are sourcing products and raw materials from. Our Strategic Purchasing team develop expert knowledge of local labour laws and human rights risks through stringent assessment and audit of potential supply chain partners.

The **Camira Supplier Code of Conduct** introduced in 2020, has continued its roll-out during 2021-22 with Camira's key suppliers. The Code supplements the Supplier Agreement Framework and is supported through various mandatory compliance training modules.

During 2022-23, Camira has initiated an in-depth review of its human rights risk analysis provision with the aim of better understanding its supply chains and assisting strategic purchasing decisions.

7. Tackling modern slavery risk in our business

The management of modern slavery risk is embedded into our recruitment processes. Supported by our Human Resource team, our management team is responsible for ensuring compliance with local labour laws and is required to only contract formal labour providers with an identifiable legitimate business entity. Additionally, it is an express requirement that there is no cost of recruitment to workers and that all recruitment costs are covered by Camira.

We recognise that it can be difficult to identify violations of human rights, particularly when there is a perception that modern slavery risk is very low. We encourage our managers to talk informally with colleagues to help us understand whether any are experiencing issues that could indicate that they are a victim of modern slavery.

Our Whistleblowing Policy and Procedure continues to underpin our encouragement for raising questions and concerns related to ethical business practices. Although we have received no reported violations, we continue to operate an independent whistleblowing helpline which is external to Camira and provides people with the option to report concerns anonymously. During 2019, we developed and published our Camira Code of Conduct which amongst other topics aims to advise our people how to identify modern slavery indicators and how to raise concerns. The final roll-out of the Camira Code of Conduct has been further postponed until 2023. To date no concerns have been raised related to modern slavery. During 2021, Camira reenergised its sustainable development ambitions through its Ambition 2026 Strategy, and in support of this, appointed its refreshed Sustainability Committee team. The team has published its sustainability report - **Making a Material Difference – Sustainability at Camira 2022.**

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8. Training on modern slavery and trafficking

All employees receive regular mandated training on ethical behaviours. During 2022 roll-out of a new training platform was completed which includes the mandatory annual completion of the new and improved modern slavery awareness refresher training. The training aims to help our employees identify and report the signs of forced labour and worker exploitation and aims to encourage them to report where a colleague may be showing signs of injury or malnourishment.

9. Next steps

In the next 12 months we will continue to strengthen our approach to managing the risk of modern slavery within our business.

- Strengthen our policy, strategy, and contractual controls through a review of the Corporate Social Responsibility Policy, and the introduction of a Human Rights Policy.
- Develop an initial high-level mapping and risk assessment of the supply chain, identifying direct suppliers, labour providers, and contractors to identify low, medium, and high-risk suppliers, paving the way for the identification of indirect suppliers.
- All supply chain partners to sign up to a Supplier Code of Conduct containing a requirement for their continued commitment to the eradication of modern slavery.
- Train and advise all our people in the purpose and principles of the Camira Code of Conduct and Supplier Code of Conduct, to ensure clear expectations about our approach to compliance and ethical issues.
- Consider opportunities to join multi-stakeholder initiatives with the aims of collaborating and sharing information about matters concerning human rights in the textile industry.

Declaration

This statement has been made in line with the reporting requirements of Clause 54, Part 6 of the UK Modern Slavery Act, and the Californian Transparency in Supply Chains Act of 2010 (SB 657), for the financial year ending 31st December 2022. This statement applies to all subsidiaries of Camira Group Holdings Limited. This statement is approved by the Board, and has been signed by the Commercial Director, on behalf of the Board of Directors.

Signed,



Anthony Croall

Commercial Director
Camira Group Holdings Limited

11th April 2023

UK based subsidiaries

Camira Fabrics Limited, Camira Transport Fabrics Limited, Camira Yarns Limited, Holmfirth Dyers Limited, Inouio Limited

Non-UK based subsidiaries

Camira Fabrics GmbH, UAB Camira Fabrics, Camira Fabrics Turkey Tekstil Limited Sirket, Camira Fabrics (Shanghai) Limited, Camira Group, Inc, Camira Group Pty Ltd, Luna Textiles, Inc

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