

# Modern Slavery Transparency Statement 2021

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## 1. Introduction

This is Camira's fourth Modern Slavery Transparency Statement issued under the Modern Slavery Act. It outlines the steps we take as a business to prevent slavery and human trafficking in our own operations and supply chains. We recognise that Modern Slavery is a growing 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 are 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

Our 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 2020 the following countries were prioritised as the highest risk areas in our supply chain for Modern Slavery:

- Pakistan
- Thailand
- Turkey
- India
- Indonesia
- China

## 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 Assessment Framework introduced in 2018, has continued its roll-out with Camira's key suppliers. The Framework was enhanced during 2019 by the development of a modern slavery specific risk assessment to be used during the appointment of suppliers to establish their credibility, legitimacy and ability to manage labour rights.

During 2020, Camira further enhanced awareness of its expectations of suppliers by introducing the **Camira Supplier Code of Conduct**. This Code targets a wider supplier group than the Supplier Assessment Framework and aims to bridge administrative control gaps that can exist at some of Camira's SME suppliers. Roll-out of the Code continues throughout 2021. Additionally, Camira's compliance team established channels for gathering and managing future modern slavery risk information.

## 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 are 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 Camira Code of Conduct was due for full roll-out during 2020, but due to the effects of COVID-19 this was postponed until 2021. To date no concerns have been raised related to modern slavery. Our Sustainability Committee worked throughout 2019 and the later stages of 2020 to develop the Camira Sustainability Roadmap and the content for our Sustainability Snapshot; we aim to publish this during 2021.

## 8. Training on modern slavery and trafficking

All employees receive regular mandated training on ethical behaviours. In November 2020 we provided modern slavery awareness refresher training. To date, 84% of employees affecting our modern slavery risk exposure have undertaken our modern slavery awareness training within the agreed time. 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 the introduction of a Human Rights Policy and a Procurement and Ethical Trading Policy.
- Develop an initial high-level 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 which will contain 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.
- Publication of a 2021 Sustainability Snapshot outlining what Camira has achieved so far and how it aims to leave a lasting positive legacy in the society, the economy and the environments in which it operates.

## 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 2020. 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

### **UK based subsidiaries**

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

### **Non-UK based subsidiaries**

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

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