

Modern Slavery Transparency Statement

Introduction

Our business

As a global textile organisation, Camira offers turn-key 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 facilities and education, and transportation on mainline trains, underground trains, public buses and coaches.

Headquartered in West Yorkshire (UK), Camira Group Holdings Limited continues to lead a dynamic group of companies with its Board of Directors retaining 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.

See our Group Compliance Policy for more information.

Our policy

Underpinning our commitment to Making the Difference, we recognise our potential to influence the safeguarding of our international, national and local communities through our Corporate Social Responsibility Policy. 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 focussed 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. Our strategies and policies are extended to our prospective supply chain partners through our Supplier Assessment Framework and are made available through our corporate website and intranet.

See our Group People Strategy, Equality & Diversity Policy & Health & Safety Policy for more information.

Our principal risks

Our approach to identifying and assessing modern slavery risk is embedded within our broader 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, particularly purchasing and recruitment practices. Overall, we consider the Group's exposure to Modern Slavery to be low.

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 which was introduced during 2018 with an achieved target of over 90% of total spend suppliers assessed. Contractual obligations between Camira and its supply chain partners is now mandated through our newly introduced Supplier Framework Agreement. Our agreement places requirements on our suppliers to support the eradication of modern slavery risks through the adherence with local legislation. During 2019 we have focussed on the development of our Supplier Assessment Framework through the redesign of questions relating to modern slavery; this new audit tool aims to inform our Strategic Purchasing team of key risks within our prospective supply chains and actively encourage the eradication of modern slavery.

Tackling modern slavery risk in our business

The management of modern slavery risk and impact in our business operations is embedded into our recruitment processes. Supported by our Human Resource team, our Leadership team is responsible for ensuring compliance with local labour laws. All employees receive regular mandated training on ethical behaviours. In November 2019 we provided modern slavery awareness refresher training. To date, 100% of employees affecting our modern slavery risk exposure have undertaken our modern slavery awareness training. We encourage the raising of questions and concerns related to ethical business practices. Besides operating an 'open-door culture' to encourage dialog between our workers and Leadership team, our 2019 Whistleblowing Policy ensures people can report any concerns in confidence. To support this, we have introduced an independent whistleblowing helpline which is external to Camira and provides people with the option to report concerns anonymously. Concerns raised are reviewed by subject matter experts within the Camira Group; we also seek external counsel when required. 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. To date no concerns have been raised related to modern slavery. Our Sustainability Committee worked throughout 2019 to develop the Camira Sustainability Roadmap and the content for our 2020 Sustainability Report.

Looking forward

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

- Improvements to our Supplier Assessment Framework by introducing 'weighted' scores that prioritise modern slavery issues;
- Improvements to our Terms of Purchase to ensure all suppliers, no matter how big or small, are captured within our risk management framework;
- 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, to ensure clear expectations about our approach to compliance and ethical issues;
- Publication of a 2020 Sustainability Report 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 2019. 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

Dated: 30th March 2020

The following subsidiaries of Camira Group Holdings Limited are represented through this Modern Slavery Transparency Statement:

EEA (Incl. UK) based subsidiaries

Camira Fabrics Limited
Camira Transport Fabrics Limited
Camira Yarns Limited
Holmfirth Dyers Limited
Camira Fabrics GmbH
UAB Camira Fabrics

Non-EEA based subsidiaries

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