

# MODERN SLAVERY POLICY & PROCEDURE

## Introduction

This statement has been produced in accordance with the Modern Slavery Act 2015 and sets out the actions that Camargue Group Limited will take to understand potential modern slavery risks related to its business activities and supply chains. This statement relates to actions and activities during the current financial year.

Camargue Group Limited is committed to preventing modern slavery in its business activities and its supply chains and detailed below are actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

## Policies

We are committed to the prevention of modern slavery which includes servitude, forced labour, human trafficking and child slavery.

Our Modern Slavery policy is delivered through a range of associated policies and procedures:

- ✓ Ethical Code of Conduct Policy
- ✓ Recruitment Policy
- ✓ Environmental Policy
- ✓ Corporate Responsibility Policy
- ✓ Work Safe & Whistleblowing Policy

Ultimate responsibility for ensuring prevention of modern slavery and for monitoring compliance to this modern slavery policy is held by Jo Lloyd, Managing Director.

The responsibility for monitoring of compliance including employee salary, employment rights and supply chain compliance is that of Russell Aldridge, Finance Director.

## About Camargue Group Limited

Camargue Group are involved in corporate and business to business (b2b) public relations, marketing communications, public affairs, strategic consulting, community consultation, internal communications, issue and crisis management, digital, bid support, business intelligence.

As at March 2022 the company has 77 employees.

The company's supply chain is limited to the supply of printed and exhibition materials for clients and office products.

Whilst not a large company and thus not covered by the specific requirements of the Modern Slavery Act, we are key contractors to large companies, and thus form an essential part of their due diligence programmes.

## Understanding the Risks of Modern Slavery

The key direct risks of Modern Slavery to Camargue Group are:

- No contracts of employment including zero hours contracts.
- Under pay of employees, self-employed contractors and subcontract companies – not paying as a minimum the living wage, and not paying an appropriate market rate for services engaged.
- Excessive working hours – the majority of our direct employees have signed Working Time Opt Out Agreements. It is noted that this can lead in some organisations to excessive working hours, defined as, in line with NHS policy as greater than 56 hours per week, or not providing suitable rest periods between shifts or as a minimum a day off per fortnight.
- Not been entitled to work in the country of employment.

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- Poor physical working conditions, including safety conditions.
- Bullying, discrimination and harassment.

### **Due Diligence**

We shall ensure that:

- Individuals have the right to work in the country of employment.
- as a minimum a Living Wage is paid.
- that pay reflects current market values for the sector and role.
- that working hours restrictions are complied with, and excessive working hours discouraged.
- that bullying, discrimination and harassment is not permitted or tolerated in any form.
- that site conditions are safe and provide a working environment conducive to the protection of the environment, human health and quality workmanship.

In regards to our supply chain our company is a medium company and thus our ability to influence the supply chain is limited. We do not sub-contract work. We will however implement due diligence in our supply chain in relation to modern slavery:

- We will issue supplier questionnaires to all our key suppliers to enable us to undertake compliance checks to our requirements and to legal requirements regards modern slavery.
- Our contractual requirements require adherence to the Modern Slavery Act 2015.
- We expect our customers to deliver the same ethical treatment of us as a supplier, particularly in regards to payment terms and conditions, rates of pay and timely payment of applications.

### **Staff Training**

We will provide all management staff training in relation to modern slavery.

### **Assessing Effectiveness**

The delivery of this modern slavery policy shall be monitored and shall form part of annual management performance review.

### **Corrective Actions**

Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions, or externally within the supply chain then appropriate corrective action shall be taken in line with the company's Control of Non-Conformity Procedure. All non-conformity shall be recorded and the required actions implemented in a timely manner.

### **Policy Review**

This will be subject to review following any lessons learnt, identification of non-compliance and as a minimum annually.

### **Policy Approval**

As the individual ultimately responsible for company compliance I endorse this policy.

Signed on behalf of Camargue Group



**Jo Lloyd Managing Director – 01 March 2022**

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