	<b>Modern Slavery Statement</b>	
<b>Document number:</b>	HR-P-025	<b>Issue level: 01</b>

This statement is made on behalf of Camden Group Limited pursuant to Section 54(1) of the Modern Slavery Act (the "Act") and constitutes our slavery and human trafficking statement.

Camden Group Limited Company registered in Northern Ireland (company number NI016568)


### **Introduction from the Company Director**

As a key manufacturer and provider in the uPVC windows and doors. From traditional casement windows to shaped frames; elegant vertical sliders to convenient and practical tilt and turn windows; super strong and high security double rebate composite doors to beautiful, outdoor living and space creating bi-folds, Camden offers a solution to every situation. Camden Group always work to the highest ethical standards and ensure that we comply with all laws, regulations and rules that are relevant to our business.

Slavery and human trafficking are totally unacceptable, and we will not tolerate forced labour of any description within our business or in our supply chains. We recognise our moral and legal responsibility to help prevent modern slavery and human trafficking and commit to taking robust and effective steps to ensure no such activities arise in the operation of our business.

Our aim is to achieve the highest ethical standards in this regard and as a minimum, we will comply with all relevant legislation. We all have a responsibility to be alert to the risks of modern slavery and human trafficking in all our daily activities. With that in mind, our employees are expected to report to us any concerns they may have in this regard and our managers are expected to act upon any concerns raised without delay.

This statement sets out the action we have taken to identify, understand and address risks of modern slavery and human trafficking in our own business and in our supply chains. It also sets out the steps we have put in place aimed at ensuring that there is no slavery or human trafficking in our own business or our supply chains.

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### Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- Overall: Our Head of HR has been appointed as the key contact for issues relating to modern slavery and human trafficking within our UK operations. Our Material Manager has been appointed as the key contact for modern slavery and human trafficking issues within our supply chains.
- Risk assessments: For our supply chains, the Group Purchasing Department is responsible for carrying out the modern slavery and human trafficking risk analysis.

### Relevant Policies

Camden Group has in place the following policies that set out our approach to the identification and prevention of modern slavery and human trafficking in our own business and our supply chains.

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## 1.0 Purpose of Policy

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## 2.0 Purchasing Code of Conduct

We are committed to ensuring that our suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide their workers with safe working conditions, treat them with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship (as described in the "Code of Business Ethics and Conduct").


## 3.0 Code of Business Ethics and Conduct

The Code sets out the standard of ethical conduct we expect from our suppliers. Suppliers are expected to sign up to the Code and to ensure that they comply with it, with major emphasis on areas which are considered to be at higher risk. The Code also sets out the implications for a supplier of acting in breach, including termination of the business relationship.

## 4.0 Due Diligence and Compliance

As part of our initiative to identify and mitigate risk, we undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers against the same criteria. Our due diligence and reviews include:

- Assessing whether or not particular activities, countries or regions are high risk in relation to slavery or human trafficking by conducting supplier audits or assessments;
- We consider suppliers from Eastern Europe or Asia to be a potential higher risk and the auditing or assessment of suppliers from those regions will have a greater degree of focus on slavery and human trafficking;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through the audit process and face to face meetings on their premises;

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- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship;
- In addition, the company directors of the supplier are asked to sign up to our Code of Business Ethics and Conduct, particularly in areas which are considered to be at higher risk.

### 5.0 Measuring Performance

In order to measure how effective we are in ensuring that modern slavery and human trafficking is not taking place in our business or supply chains, we are:

- Continuing to develop a system for supply chain verification, in place since (Date), whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Conducting a review of our existing supply chains, expected to be completed by (Date), whereby the organisation evaluates existing suppliers.

### 6.0 Training

We require all key staff within our supply chain to complete training on modern slavery to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains.





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Bernadette Clarke				06/04/2019