



## MODERN SLAVERY ACT STATEMENT

### INTRODUCTION FROM CEO, PETER CUNNINGHAM

*Camlin remains committed to improving our practises, in place to mitigate acts of modern slavery and human trafficking. We remain devoted to ensuring that no human trafficking, human rights issues or modern-day slavery exists within our businesses or supply chains.*

*We act ethically, responsibly and with integrity, always.*

### ORGANISATIONS STRUCTURE

We are a manufacturer and provider of engineering and software services mainly within the utilities sector. We also have several R&D projects in a variety of scientific sectors. Camlin Group supplies an innovative range of products and services to the power, rail, and gas industries. The main operating companies housed within the Camlin Group are Camlin Energy, Camlin Rail and Kelvatek. Camlin Group has its head office in Lisburn, Northern Ireland. The Group has over 500 employees worldwide and operates in over 20 countries across the globe.

Camlin Group has a global annual turnover of approximately £57.5- £58 million in 2022.

### OUR BUSINESS

Our business is organised into 3 primary business units:

#### **Camlin Energy**

Camlin Energy designs and manufactures a range of value adding power solutions to help our utilities provide a better service to their customers, and ultimately, keep the lights on around the world. We provide products and solutions across the electrical network including high voltage asset monitoring equipment for helping utilities manage their transformers, generators, and circuit breakers. Camlin Energy has over four decades of successful history in the Electric Utility industry and have been responsible for a range of innovative and widely adopted solutions across global markets.

Camlin is also entering the renewables market by developing renewables products from sources such as wind and biogas.

#### **Kelvatek**





An innovation partner supporting the transition for DSOs, Kelvatek offers smart integrated solutions that optimise distribution network performance and efficiency. Kelvatek are the UK leader in Low Voltage fault detection and intelligent network automation, with a comprehensive, modular suite of software, managed services and connected smart devices under our SAPIENT predictive analytics and asset management platform.

### **Camlin Rail**

Camlin Rail designs, manufactures, and supplies a range of innovative products to the rail industry. A global business, Camlin rail focuses on international growth and expansion providing innovative solutions for the railway industry. The company has many elements combining industry-leading R&D, state-of-the-art test facilities, in-house manufacturing and quality control, dedicated customer technical support and sales.

### **OUR SUPPLY CHAIN**

Company activities are varied through sales, distribution, and logistics activities. We have an approved supply chain to support us through the different aspects and supply of products for our business.

Camlin select suppliers who demonstrate an awareness of environmental and labour practice issues. We avoid material selection requiring recognised environmentally destructive and ethically unacceptable practices. To attain selection of hazardous materials would only be after exhaustive searching for safer alternatives to meet similar performance. Our selection of supplier materials and components consider energy consumption reduction when designed into the product and recyclability of selected materials, components and designs is considered early in the planning process.

Camlin follows a strict supplier selection process requiring all suppliers to rate highly on available capacity, effective quality management system, technical capability, company infrastructure and financial stability. The supplier selection process is used to ensure Camlin selects a supplier that can meet a products technical and quality requirement at the rate demanded, and to ensure we choose a supplier who meets our expectations relevant to our values. Our selection process includes a site visit by the Camlin supplier quality engineer, purchasing manager and design engineering representative. We ask suppliers to fill out questionnaires, we perform regular audits, and site visits with our suppliers to ensure they conform with standards, and good working practises.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This 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. Camlin strives to be socially, environmentally, and ethically responsible company. Through our diverse array of products, processes and people, we impact society in many ways, from developing world class technology used globally, local community assistance through employment and training support or in contributing to non-profit organisations, Camlin seeks to be a responsible company and good community partner.

## HUMAN RIGHTS

Respect for human rights is an extension of our values. As part of our effort to conduct business in an ethical manner, Camlin will not engage in business practices or activities that compromise fundamental human rights or breach any sections of the Modern Slavery Act: 2015.

## WORKING CONDITIONS

Camlin is committed to ensuring that the individuals building our products and components and providing services to our company are afforded responsible working conditions and are treated with dignity and respect.

- **Child Labour**  
We shall not hire children who do not reach the legal age for work in each country and region.
- **Forced Labour**  
No form of human trafficking, forced, bonded or compulsory labour shall be used.
- **Compensation and Working Hours**  
Wages, including overtime and benefits, shall comply with local law, including those relating to minimum wages, overtime hours and legally mandated benefits. Working hours shall comply with applicable local laws.
- **Harassment and Discrimination**  
Harassment or discrimination in any form is not acceptable.
- **Freedom of Association**  
We encourage open communication with management regarding working conditions without fear of reprisal, intimidation, or harassment. We believe that maintaining an environment for dialogue between associates and





management will deepen free, open-minded, and two-way communication, making it possible to build a stronger relationship of mutual trust.

- **Health & Safety**

Associates shall have a safe and healthy working environment that meets or exceeds applicable standards for occupational safety and health.

## CODE OF ETHICS AND COMPLIANCE

Trust is a critical foundation of a successful and sustainable business. We work hard to create trust between Camlin and its customers, suppliers, and business partners. To maintain a high degree of trust with all stakeholders, it is therefore a core responsibility of all Camlin associates and suppliers to conduct business in an open, honest and ethical manner, and to follow the company's code of ethics in all their business practices. This includes upholding all laws in the places where we do business.

- **Prevention of Corruption**

We shall establish transparent and fair relationships with government entities and public officials. All political contributions and donations shall comply with each country's and region's laws.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we commit to the following, but not limited to, actions:

- Educate our staff on policies and outline channels of escalation for concerns.
- Encourage staff to report concerns to management, and in return for management to address those concerns.
- Regular audit and review of employee's salaries to ensure they have the right to work and are being paid at least minimum wage.
- Adopt a zero-tolerance policy to human trafficking and slavery, expecting all those in our supply chain and any part of our business to comply.
- Implement detailed vetting measures and investigation of our supply chain.
- Not knowingly collaborate with another company involved in slavery or human trafficking.
- Always put the health and wellbeing of our workers first.

We have in place systems to:





- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Our Due Diligence process applies to all staff of Camlin and its subsidiaries and suppliers.

## SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- Training to all members of staff on policies, processes, and procedures within Camlin.
- Senior management support & commitment.
- Communications with supply chain, external stakeholders, and a partner, to ensure alignment in our expectations to mitigate any risks of modern-day slavery or human trafficking.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Audit and compliance.
- Human resources.
- Procurement.
- Sales.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff, suppliers and providers to ensure transparency and alignment across the board.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:





- Communications to promote transparency across our business and supply chains to ensure understanding and expectations
- Completion of regular audits.
- Payroll & HR management systems.
- Detailed vetting and recruitment process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Camlin's slavery and human trafficking statement for the financial year ending December 2022.

PETER CUNNINGHAM, CEO

CAMLIN LIMITED

Date: 31/12/2022

