



Anti-Slavery & Human Trafficking Policy



ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Established in 2008, Cammach Recruitment has quickly become recognised as a key player in recruitment in Aberdeen. In September 2017, Cammach solidified their place in the market by acquiring Bryant Group. The Group included Bryant Personnel Services, established 1980 and Bryant Engineering Services, established 1983. The two companies went through a successful amalgamation period and officially started trading as Cammach Bryant Limited in June 2018. In November 2020 Cammach Bryant was acquired by Global Energy Group Capital, we continue to trade as Cammach Bryant Ltd.

Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

Cammach Bryant has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

Cammach Bryant expects our contractors, suppliers and other business partners to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. Cammach Bryant expect their suppliers to hold these high standards.

This policy applies to all persons working for, or on Cammach Bryant business, in any capacity. This includes but does not limit the policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we reserve the right to amend it at any time.

RESPONSIBILITY FOR THE POLICY

Cammach Bryant's Managing Director has overall responsibility for ensuring this policy complies with Cammach Bryant's legal and ethical obligations, and that all those under our control comply with it.

Cammach Bryant's Managing Director has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The Managing Director is also responsible for updating the policy to reflect any changes in legislation.

Management at all levels of Cammach Bryant are responsible for ensuring those reporting to them understand and comply with this policy, and are given adequate and regular training on Modern Slavery.

Cammach Bryant employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be documented on our Improvement Database.



COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

All Cammach Bryant employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

You must notify your manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future.

Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage.

If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any, or all of, the various forms of Modern Slavery outlined above, notify your manager.

COMMUNICATION AND AWARENESS OF THIS POLICY

This policy is available as part of our BMS. Modern Slavery training, which includes identifying signs of Modern Slavery and reporting suspicions of Modern Slavery supply chains, forms part of the induction process for employees. Refresher training will also be provided as necessary.

Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the Cammach Bryant Conduct policy. We may terminate our relationship with other employees, suppliers and any other associates working with Cammach Bryant if they breach this policy.

A handwritten signature in blue ink that reads 'Iona Currie'.

Iona Currie – Managing Director