 Campbell & Kennedy Maintenance <i>Attitude is everything</i>	Modern Slavery Policy	IMPL-40	
		Revision:	1.1
		Date:	24/3/2021
		Approved by	GK

Modern Slavery Policy Statement

Introduction

This statement is made in pursuant to section 54 of the Modern Slavery Act 2015.

The Policy reflect the Company's obligations under the Modern Slavery Act 2015 and the Company's commitment more generally to avoid any form of modern slavery or human trafficking its operation or supply chain. The Company has a long-standing commitment to conducting business in a responsible way.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Campbell & Kennedy Maintenance Ltd, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have during the financial year 2021-21.

Our business and supply chains

Campbell & Kennedy Maintenance was established in September 2004 and operates across the UK from its base in Glasgow. Campbell & Kennedy Maintenance Ltd is a one stop Installation Services partner operating in the Technology Sector. The company provides a wide range of solutions for both public and private sector organisations. At Campbell & Kennedy Maintenance Ltd we embrace a culture of "Can Do". The company installs and maintains Communal TV Aerial & Satellite Systems, Integrated Reception Systems, SMATV, IPTV, Fibre Optic Solutions, IOT System installations, Gigabit Broadband installation, and Field Audits.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk assessment

In the past year, we conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups

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- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Policies

Campbell & Kennedy Maintenance Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Disclosure Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Ethical Code of Business Policy - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.
- Staff Welfare Policy – We protect employees right to safe and secure work environment and the all employees understand their rights for reporting welfare concerns
- Equality & Welfare Policy- WE set out clear objectives so that all employees understand clearly our policies in eliminating discrimination of any kind in our business.
- Training Policy- we set out clearly all employees fundamental rights to training and development within our business.

Supplier due diligence


Campbell & Kennedy Maintenance Ltd conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to attest that:

- They don't use any form of forced compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.

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- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons.
- They don't require employees to surrender their passports or work permits as a condition of employment.

Awareness

Campbell & Kennedy Maintenance Ltd has raised awareness of modern slavery issues by putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, Campbell & Kennedy Maintenance Ltd has rolled out a fresh e-learning course to all employees and supplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited.
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery?
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls?
- What steps CKM will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by CKM's anti-slavery policy

Measuring how we Perform

Campbell & Kennedy Maintenance Ltd has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

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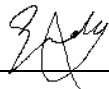
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- What are the findings of our cross-functional Human Rights team, which reviews how we are addressing modern slavery and human trafficking?

This statement covers 1 January 2021 to 31 December 2021 and has been approved by the board of Campbell & Kennedy Maintenance at the board meeting on 24 March 2021.

Signed  Date: 24/03/2021

G. Kennedy, Commercial Director

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