



# Anti-Slavery Policy

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### Version control

Version	Date	By	Comment
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### Contents

Background .....	3
Responsibility for the policy .....	3
Compliance with the policy .....	4
Communication and awareness of this policy .....	5
Breaches of this policy.....	5

## Background

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy applies to all persons working for Cambridge Energy ("CE") or on CE's behalf in any capacity, including but not limited to employees at all levels, directors, management, volunteers, interns, agents, consultants and business partners.

This policy does not form part of any employee's contract of employment and may be amended it at any time.

## Commitments

CE has a zero-tolerance approach to modern slavery, and CE is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

CE is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

CE expects the same high standards from all of our customers, suppliers and other business partners, and as part of our contracting processes, and will work towards including prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, in our contracts with third parties.

As part of CE's ongoing risk assessment and due diligence processes, CE will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with respect to this policy.

## Responsibility for the policy

CE has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

CE has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

All employees of CE, as well as third parties, 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 addressed to CE's Head of Compliance.

### **Compliance with the policy**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for CE or under CE's control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager or a director of CE as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of CE's business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or director of CE, or report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, CE will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or a director of CE.

CE aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. CE is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure, which can be found in the current employee handbook.

### **Communication and awareness of this policy**

Training on this policy, and on the risk CE faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

CE's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. CE may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



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