



## Modern Slavery Policy

### Purpose

CAMILLA is committed to preventing and eradicating modern slavery within our operations, supply chains, and business relationships.

Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power. It covers a set of legal concepts including human trafficking, slavery and slavery-like practices and forced labour.

The fashion apparel industries are widely recognised as having significantly elevated modern slavery risks within their supply chains, particularly in the forms of forced labour, child labour and debt bondage.

This policy applies to all employees, contractors, suppliers, partners, and stakeholders associated with our organisation.

### Policy Statement

At CAMILLA we are firmly committed to upholding human rights and ensuring the dignity and well-being of all individuals. We condemn all forms of modern slavery and will take proactive measures to prevent and address any instances that may arise within our sphere of influence.

Our commitment is underpinned by the following principles. We ask all those we engage with support us to uphold these principles:

a. No forced or bonded labour.

Work should be freely chosen without threat of penalty or abuse. No worker should be forced or coerced to work to repay a debt. Workers should be free to leave their employment and their movement should not be restricted (including by controlling identity papers, holding money deposits or restricting movement in other ways).

b. No worker should pay for a job.

Fees and costs associated with recruitment and employment should be paid by the employer.

Workers should not be charged recruitment fees or other costs associated with their migration or employment.

c. Workers should be treated and paid fairly for the work they do.

Workers should be treated and paid fairly without any kind of discrimination and in accordance with all local laws, including those relating to minimum wage, leave entitlements and other benefits. Employers should pay or should take steps towards paying workers a living wage, the minimum income necessary to meet their basic

# Camilla

needs, including some discretionary income. Overtime hours should not be excessive and should be compensated appropriately.

d. No child labour.

No workers are under the age of 15 or under the local legal minimum age for work or mandatory schooling age, whichever is the higher. Young workers must not do work that is mentally, physically, socially, or morally dangerous or harmful. Work should not interfere with children's schooling, or their ability to benefit from it.

e. Respect rights of workers to freedom of association.

Respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

f. Workers should be able to raise grievances safely.

Workers should have access to a mechanism to raise concerns which allows for confidential and anonymous reporting and protects workers from reprisal. There must be transparent processes for investigating and reporting on the issues raised through the reporting mechanism.

## **Responsibilities**

- The CAMILLA Board have ultimate responsibility for our management and mitigation of modern slavery risks, including ensuring that an appropriate framework is developed, and continuously improved, for risk management practices and long-term strategies.
- The senior leadership team is responsible for setting the tone, providing resources and support, and championing the implementation of this policy across the organization.
- The CAMILLA CSR Committee oversee the modern slavery planned actions. This Committee is the steering group for supervision of the key actions, responsibilities, and targets relating to its modern slavery response.
- All CAMILLA employees are expected to adhere to this policy, report any suspected instances of modern slavery, and actively participate in training and awareness programs.



# Camilla

- We expect our suppliers and partners to adhere to similar ethical standards and actively engage in efforts to combat modern slavery within their own operations and supply chains.

## **Awareness and Training**

This policy will be communicated to all employees, contractors, suppliers, partners, and stakeholders. It will also be made publicly available on our website.

We will provide appropriate training, including refresher training, relating to this policy and related procedures. Any newly hired officers and employees will receive such training as part of their induction.

## **Risk Assessment and Due Diligence**

We will conduct regular risk assessments to identify and evaluate modern slavery risk within our operations and supply chains.

We will undertake due diligence during onboarding to assess suppliers, partners, and contractors to ensure acceptable management of modern slavery is in place.



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## **Violations and Remediations**

Any actual or suspected violation of this policy or instances of modern slavery may be directed to Director of People and Culture or another member of the CAMILLA Executive team.

If CAMILLA discovers any breach of this policy, we will work to remediate the situation and engage relevant stakeholders to provide or facilitate access to remedy for the affected individual/s.

Non-compliance with this policy may result in disciplinary action, including termination of contracts, partnerships, or employment.

## **Collaboration and Improvement**

We will collaborate with industry peers, governmental agencies, and non-governmental organisations to share best practices, knowledge, and resources in the fight against modern slavery.

At CAMILLA we are committed to regularly reviewing and improving our modern slavery prevention and eradication efforts based on emerging best practices, changing risks, and stakeholder feedback.

## **Monitoring and Review**

The ESG Manger is responsible for coordinating the revision, interpretation and application of this policy.

The policy will be reviewed as and when required but not less than every five years.