

SOCIAL COMPLIANCE POLICY

Cambio Ltd is committed to ensuring that any business undertakings are conducted as ethically as possible by following this. Cambio Ltd is also committed to continuous improvement of labour standards on-site and in our supply chain and the latter includes both our suppliers and sub-contractors.

Who we are and what we do

Cambio Ltd is a family-owned business that supplies reagents and kits largely for life science research purposes to a broad customer base, predominantly located in the United Kingdom and Ireland, but also to other countries in around the world. Cambio is mainly a distribution business but we also manufacture some of our own products including human genomic DNA. Cambio has a turnover of < £1m per annum and <20 employees who are treated with the utmost respect. We hold the rights of our employees and customers as extremely important to us and have systems in place for ensuring that the workplace is a safe, fair and comfortable environment.

Looking after Employees

Our commitment to human rights

Cambio Ltd is committed to the principles of the Modern Slavery Act 2015, and to the abolition of modern slavery and human trafficking. As an equal-opportunities employer, Cambio Ltd is against discrimination in the workplace in any form and is committed to ensuring a respectful working environment for its staff. Cambio Ltd would like all its staff to feel confident that they can expose wrongdoing without any risk to themselves.

Cambio maintains policies on: **Human Rights, Ethics, and Code of Conduct**. We also refer to ACAS policies found at www.acas.org.uk on: **Whistleblowing, Equality and Discrimination, Harassment and Bullying, Recruitment, Grievances, Disciplinary matters, and Appeals**. These are readily available to all Cambio Ltd staff. All Cambio Ltd employees have the right to seek legal support if they think that they are treated unfairly.

According to the Universal Declaration of Human Rights we respect the rights of individuals to be employed, to be free to choose their employment, and to be paid a fair salary that allows them to live and support their family. Everyone who does the same work has the right to equal pay, without discrimination.

Cambio Ltd workers have the right to come together and form trade union groups to defend their interests as workers. Cambio Ltd adopt an open attitude towards the activities of trade unions and their organisational activities. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, Cambio Ltd facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Working conditions

Working conditions at Cambio Ltd are safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Access to clean toilet facilities and to potable water, sanitary facilities and facilities for food storage is provided. Accommodation, where provided, is clean, safe, and meets the basic needs of the staff.

Health and Safety

Cambio takes health and safety on company premises very seriously. We carry out an annual Health and Safety audit and seek advice on the latest developments from HSE and implement them if there is a legal requirement or wherever possible to meet or exceed good practice. All staff receive health and safety training for the work they carry out. We carry out annual fire assessments, fire drills and emergency chemical drills. Cambio Ltd assigns the responsibility for health and safety to the Managing Director.

Staff training, appraisals and personal development

Staff receive training for their specific roles and receive additional training as necessary. All staff are given appraisals annually in which their personal development is reviewed with the aim of identifying key areas where new personal development would be beneficial.

Communication with and between staff

It is company policy that communication between members of the Cambio team should always be as clear as possible by whatever means used.

Pay and benefits

Cambio staff are paid in excess of the legal National and Living Minimum Wage, on time, have pension plans commensurate for their roles, and are provided equipment needed to perform their jobs effectively. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages are always enough to meet basic needs and to provide some discretionary income. All workers are provided with written and understandable Information about their employment conditions in respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure are not permitted nor are any deductions from wages that are not provided for by national law, and not without the expressed permission of the member of staff concerned.

Working hours

Working hours at Cambio Ltd are not excessive. Working hours comply with national laws, collective agreements, and the provisions outlined below in this paragraph, and taking into consideration whichever affords the greater protection for workers: Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week unless an employee has opted-out, which shall not be coerced, and is entirely the employee's free decision to do so. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. All employees have the right to rest and leisure time. Employees are encouraged to take all their holidays with pay that they are entitled to in their contracts of employment.

Human Resources

Where necessary Cambio Ltd uses an external HR consultancy and law firm to ensure that any HR issues are dealt with in a timely and professional fashion.

Discrimination

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Please refer to ACAS for a more detailed policy: www.acas.org.

Regular employment

To every extent possible, work performed is on the basis of a recognised employment relationship established through national law and practice. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship are not avoided through the use of labour-only contracting, sub-contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Employee benefits

Cambio Ltd aims to make the work a happy and fulfilling occupation and this includes time off over Christmas break that is given in addition to the annual leave entitlement. Time needed for festive celebrations from any religion is treated with the utmost respect and we always aim as a company to be as flexible as possible and to accommodate the needs of employees to fulfil obligations outside work, including but not limited to parental leave.

Grievances and Disciplinary matters

Cambio treats these matters with great importance and follows current guidelines available on the ACAS website: www.acas.org. All disciplinary measures are recorded. No harsh or inhumane treatment is permitted at Cambio Ltd. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

Child labour

Child labour is not used at Cambio Ltd and there shall be no new recruitment of child labour. We shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices. Children and young persons under 18 shall not be employed at night or in hazardous conditions. These policies and procedures shall conform to the provisions of the relevant ILO standards.

Looking after Customers

Cambio Ltd always aims to put the customer first. We always do our best to provide quotes, fulfil orders, supply goods and deal with any potential customer complaints or issues in a very timely and professional fashion.

As a distributor we choose our suppliers very carefully and only supply goods and services which to the best of our knowledge are safe to use in a laboratory and which are of the highest quality.

We always aim to communicate as clearly as possible with our customers by whatever means of communication used.

Suppliers' Standards

We manufacture human placental genomic DNA ourselves to the highest standards and this is reflected in its inclusion in our ISO9001: 2015 certification. We also supply goods from overseas. All our suppliers have been informed of our Human Rights Policy. We always aim to have the clearest possible communication with our suppliers and pay them the correct amount due and on time.

Protecting the Environment

Doing all we can to protect the environment is vital to Cambio Ltd (refer to the latest version of the Cambio Ltd Environmental Policy).

Community Engagement

We regularly provide monetary donations to a local school. In the past we have funded medical charities, talks to help prevent knife crime, and sporting events. We always aim to use local services for any building works, repairs and courier jobs.

Anonymous Grievances

Grievances can be made anonymously by writing to the Managing Director, Cambio Ltd, 1 The Irwin Centre, Scotland Road, Dry Drayton, Cambridge, CB23 8AR.

Review and Implementation

Our working practices and commitment to equality, human rights and the environment and other matters listed above are under constant review and are reviewed annually in our management review.

Framework of objectives and targets for social compliance

Labour and ethics

We aim to resolve all grievances within 21 days and will monitor grievances on a score card.

Health and safety

We aim to have zero accidents at Cambio Ltd and we will record any accidents at Cambio Ltd.

Environment

We aim to meet one environmental initiative goal at Cambio Ltd every quarter and will keep records of progress.

Legal requirements

We are also committed to complying with all legal requirements whether they relate to labour and ethics, human rights or the environment or other issues relating to social compliance.

This statement has been approved by the Cambio Ltd Chairman and constitutes our Social Compliance Policy statement for the financial year ending 31 March 2020. This statement will be reviewed and updated annually.

Dr Jonathan Dean PhD, Chairman and Managing Director – Cambio Ltd

[JD - Electronic signature] – 27thth March, 2020