



Comar Group.

Comar Group Ltd

Including

Comar Optics Ltd, Access Expeditions Ltd,
Grillo Group Ltd, Comar Investments Ltd

Modern Slavery, Human Trafficking and Human Rights Policy Statement

1. This is a voluntary statement made under section 54 of the Modern Slavery Act 2015, to convey the values and commitment of the Comar group of companies to ethical trading principles and to emphasise our strongly-held stance against modern slavery and human trafficking in our businesses and in our supply chains.
2. The Comar Group includes Comar Investments Ltd and subsidiary companies: Comar Optics Ltd; Comar Group Ltd; Access Expeditions Ltd and Grillo Group Ltd.
3. The Comar Group are committed to create a happy and inclusive working environment within which everyone is treated with dignity and respect. We are committed to acting ethically and with integrity and transparency in all our business dealings. We strive to provide excellent working conditions and facilities for all our employees.
4. The directors and management fully support the legislation and have a zero-tolerance approach to slavery, servitude, forced, bonded and compulsory labour and human trafficking, and all forms of modern slavery.
5. We only employ people at or above the legal minimum age and seek to work directly with suppliers that also share this approach. We recognise that our employees may wish to leave us to pursue their career and personal goals and we respect their right to do so.
6. This policy applies to everyone working for us, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and our business partners, contractors, consultants, suppliers, distributors, agents and any other third party representatives.
7. Where we do not have direct control over the activities of those with whom we work, we encourage them to adopt the same or similar standards to those contained within our policy and we expect our suppliers to hold their own suppliers to the same or similar standards.
8. Our policy is fully supported by our Board. All members of the Group's Management Board take overall responsibility for ensuring compliance with our legal and ethical obligations and will implement our policy within their part of the Group. Management at all levels are responsible for ensuring those reporting to them understand and comply with our policy.
9. We are committed to maintaining a working environment that is free from any form of harassment, abuse, bullying or victimisation. We expect all employees to be treated with respect, dignity and thoughtfulness.



10. Comar are committed to ethical trading principles and to acquiring goods and services without harm to others.
11. To help identify and monitor the risk of slavery and human trafficking in our supply chain we vet and audit suppliers and sub-contractors to ensure that they are committed to ethical labour practices.
12. Whilst we do not normally employ any agency workers, if we do need to we would only use reputable employment agencies that adhere to our anti-slavery and human trafficking policies.