

Modern Slavery & Human Trafficking Policy

UNCONTROLLED WHEN PRINTED OR DOWNLOADED

Doc Ref: MAC-PL-001

Version number: 1

Classification - Public

Macro

Table of Contents:

1. Purpose and scope.....	3
2. Policy Content.....	3
3. Roles and Responsibilities.....	4
4. Reporting.....	5
5. Policy Breaches.....	6
6. Supporting Policies.....	6
7. Policy Communication.....	6

Version Number	Date	Notes on changes since last version
1	24/02/2024	Newly issued

UNCONTROLLED WHEN PRINTED OR DOWNLOADED

Doc Ref: MAC-PL-0001

Version number: 1

1. Purpose and scope

Integrity is one of the core values under which Macro operates. Macro is committed to being a responsible business and to upholding high ethical standards in all our operations around the world. This purpose of this policy is to highlight our approach to mitigating the risks that modern slavery and human trafficking pose to our business, clients, and supply chain.

Compliance with this policy is mandatory for all employees of Macro Group and Macro suppliers as follows:

- Individuals: Macro Group employees, contract and temporary or other persons acting on behalf of Macro Group in all countries in which Macro Group or its subsidiaries and associates operate
- Macro Group companies located throughout the world
- Third parties: Macro Group requires that third parties performing services for or on behalf of a Macro Group company, including but not limited to agents, brokers, joint venture partners, partners, distributors, consultants, suppliers, subcontractors, service providers and any other representatives of Macro Group (hereinafter collectively referred to as Third Parties) shall adhere to the rules contained in this policy or demonstrate to Macro Group that they have equivalent standards in their own modern slavery and human trafficking policies and procedures.

2. Policy Content

Modern slavery is often a hidden crime involving one person denying another person his or her freedom in order to exploit them for personal or commercial gain and includes:

- Slavery
- Servitude
- Forced and compulsory labour
- Human trafficking, as defined in the Modern Slavery Act 2015; the arranging or facilitating the travel of another person with a view to their exploitation.

This policy sets out the approach Macro takes with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chains. The aim of this policy is to communicate our responsibilities and highlight the risks that modern slavery and trafficking pose to our business, clients and supply chain.

Modern Slavery and Human Trafficking encompass the following (non-exhaustive) range of practices:

- Wages being deliberately withheld as a means of forcing workers to accept poor conditions or prevent them from changing jobs

- Forced labour and debt bondage, where victims are forced to work against their will and/or to pay off debts
- Criminal exploitation, where victims are controlled, maltreated and forced into committing crimes against their will
- Freedom of movement is denied with travel and ID documents confiscated by employers
- Child trafficking, where young people are moved with intention of being exploited

Macro is committed to upholding high ethical standards in all our operations, including those of our supply chains, around the world. Our commitments are summarised in our, Responsible Business policies.

The Global Slavery Index (as published by Minderoo Foundation's Walk Free Initiative) highlights the country level risk that labour standards issues could be present in the supply chains. To identify and mitigate the risks of slavery and human trafficking, Macro takes the following focused approach to the procurement of labour, goods and services:

- Identification of issues and risks
- Collaboration with our clients, peers and suppliers
- Clear definition and contractual communication of our expectations
- Review, audit and assessment of supplier compliance
- The resolution of challenges through training and supplier development.

We assess our Suppliers' programs regarding Modern Slavery policies and include compliance with this policy as part of our sourcing terms and conditions.

Where Macro acts in an advisory capacity, we advise our clients of the requirements of the Modern Slavery Act 2015 and provide relevant guidance on the associated risks that modern slavery in their supply chains may bring.

3. Roles and Responsibilities

The Board of Directors has overall responsibility for ensuring this policy complies with our legal obligations, and that all employees and third parties which have a contractual relationship with Macro, complies with it.

Macro Group management responsibility:

- Every line manager is responsible for ensuring that their employees operate in compliance with this policy.
- All members of senior management (sector directors, departmental heads and project directors) are required to consider, and if necessary, put in place, additional arrangements within their teams, sectors and/or projects to ensure compliance.
- Account managers are required to communicate Modern Slavery risks with their clients and suppliers.

UNCONTROLLED WHEN PRINTED OR DOWNLOADED

Doc Ref: MAC-PL-0001

Version number: 1

Macro

- All members of senior management are under a duty to rigorously investigate instances of alleged slavery or trafficking with support from the legal department.
- The QHSEW Senior Leadership team (SLT) is responsible for drafting and reviewing this policy, and associated guidance and training materials.
- A program of external audits has been developed and agreed by the Responsible Business Board and approved by the Executive Management Board. These will be undertaken on a periodic basis to provide reasonable assurance that the policy and procedures are working effectively and to enable risk areas to be identified and addressed.

Macro Group employees' responsibilities:

- Compliance with this policy is the responsibility of every employee of Macro Group (including temporary employees and consultants) and any person who acts on behalf of Macro Group and any person who participates in the Macro Group activities.
- This policy applies to all activities of Macro Group including its sector bodies, joint ventures, boards, committees, working groups, technical groups, and sub-groups.

Each Macro Group employee is required to:

- Adhere to this Modern Slavery & Human Trafficking Policy
- Read and abide by any Macro Group modern slavery and human trafficking guidelines as published from time to time
- Complete periodic Modern Slavery training and refreshers
- Share best practice on eliminating modern slavery from supply chains
- Be vigilant and report concerns or suspicions relating to modern slavery or human trafficking to Macro Group's HR Director or SCM Director.

4. Reporting

As an international company, Macro Group aims to:

- Ensure full compliance with all laws and regulations by all of its third parties, subsidiaries and employees
- Train employees and where appropriate, third parties, so that they can recognise the signs of modern slavery
- Encourage its employees to be vigilant and to report any suspicion of modern slavery or human trafficking by providing them with suitable channels of communication and ensuring sensitive information is treated appropriately

With regards to whistleblowing and speaking up against instances of modern slavery or human trafficking:

- Macro Group employees must report immediately any suspicion they have that acts of modern slavery or human trafficking are occurring (however insignificant or trivial it may appear and whether it involves other Macro Group employees or third parties). Please report any concerns to the Head of HR or Head of Sourcing.
- Macro Group strictly prohibits victimisation against anyone for raising or helping to address suspected acts or concerns about modern slavery or human trafficking. Anyone found guilty of victimisation will face disciplinary action. Macro Group is committed to ensure that anyone who raises a concern in good faith suffers no detriment as a result.
- Where staff or third parties have concerns around issues of forced labour, human rights, recruitment practices or exploitation, they are encouraged and expected to report concerns via a confidential email address macrolegal@macegroup.com. All reports will be investigated.

5. Policy Breaches

Our zero-tolerance approach to modern slavery and human trafficking must be communicated to all employees. Macro Group will not hesitate to take legal, and/or disciplinary action against those who act in breach of this policy. This means:

- Macro Group will not conduct business with any third parties whom it has reasonable grounds to suspect are involved in modern slavery or human trafficking
- Employees who deliberately disregard the procedures and guidelines in this policy will face disciplinary action

6. Supporting Policies

This policy has been formulated within the context of the following documents:

- Macro Group employee handbook
- Health & Safety Policy
- Responsible Business Policy
- Confidential Reporting Policy
- Recruitment Policy

7. Policy Communication

- This policy will be reviewed and updated as necessary on an annual basis.
- Employees will be informed of any change made to an existing policy via Macro's intranet site.

Macro

- For new employees training on this policy is integral to the induction process and online training.
- It is the responsibility of every employee to ensure they read, comply and keep themselves up-to-date with all relevant policies.
- This policy must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Consequences of non-compliance may result in termination of contractual agreements.

UNCONTROLLED WHEN PRINTED OR DOWNLOADED

Doc Ref: MAC-PL-0001

Version number: 1