

# Anti-Slavery and Human Trafficking Policy

## POLICY STATEMENT

1.1 Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

1.2 Machmade Ltd has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

1.3 We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

1.4 Machmade Ltd expects our contractors, suppliers and other business partners to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. Machmade Ltd expect their suppliers to hold these high standards.

1.5 Machmade Ltd will be in contact with relevant suppliers to ensure they comply with the Modern Slavery Act 2015, In addition to this, to check compliance, we will be auditing our higher risk suppliers, as determined by our predetermined criteria.

1.6 This policy applies to all persons working for, or on behalf of Machmade Ltd, in any capacity. This includes but does not limit the policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.

1.7 This policy does not form part of any employee's contract of employment and we reserve the right to amend it at any time.

## **2. RESPONSIBILITY FOR THE POLICY**

2.1 The Machmade Ltd. Leadership Team has overall responsibility for ensuring this policy complies with Machmade Ltds legal and ethical obligations, and that all those under our control comply with it.

2.2 The Machmade Ltd Managing Director has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The Managing Director is also responsible for updating the policy to reflect any changes in legislation.

2.3 Management at all levels of Machmade Ltd are responsible for ensuring those reporting to them understand and comply with this policy, and, are given adequate and regular training on Modern Slavery.

2.4 Machmade Ltd employees 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 your Evolve Representative.

## **3. COMPLIANCE WITH THE POLICY**

3.1 You must ensure that you read, understand and comply with this policy.

3.2 All Machmade Ltd employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

3.3 You must notify your manager OR Function Head as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. You can also report any suspected breach by following our Whistleblowing Policy.

3.4 Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage (see 3.3).

3.5 If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any, or all of, the various forms of Modern Slavery outlined in 1.1, follow 3.3.

#### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

4.1 This policy is available on the Machmade Ltd notice boards and intranet

4.2 Modern Slavery training, which includes identifying signs of Modern Slavery and reporting suspicions of Modern Slavery with Machmade Ltds. supply chains, forms part of the induction process for employees. Refresher training will also be provided as necessary.

4.3 Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

#### **5. BREACHES OF THIS POLICY**

5.1 Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the Machmade Ltd's Conduct policy. We may terminate our relationship with other employees, suppliers and any other associates working with Machmade Ltd if they breach this policy.

Approved by:



**Director – Neil Illingworth**

**Date 28/03/2022**

