

Modern Slavery and Human Trafficking Statement

This statement defines the approach Macro Group and its subsidiaries have taken to comply with the Modern Slavery Act (2015) in the reported financial year, plus the planned actions in the 2024/25 financial year; to prevent, detect and respond to modern slavery and human trafficking risks within our business and supply chain. This statement will remain active until the next financial year.

1. Macro Group structure and supply chain

Macro is a global facilities management and workplace services company. We serve our clients' global facilities portfolios in 45+ countries across the Americas, Europe, the Middle East and Asia Pacific. For more than two decades, we have been focused on building a global footprint and evolving our agile delivery model to ensure our FM services can adapt and grow with our clients' business. During the reporting period we employed over 800 people worldwide and operate in over 46 countries. We are a privately owned and unquoted company governed by a board and chairman and an executive management team of directors.

In our 2023-2024 financial year (1st Jan 2023- 30th June 2024), our supply chain spend was over £100m globally; covering categories from specialist engineering, cleaning services, energy consultancy to consumables supplies. Understanding that our supply chain may pose a significant risk for modern slavery, Macro has committed to supply chain specific objectives as part of our sustainability strategy, which forms part of our business plan:

1. Work with our suppliers to ensure that modern slavery or human trafficking is not taking place within our business or within our supply chains.
2. Encourage our supply chain to develop their own ESG programs and commitments and growing our spend with ethical, diverse and sustainable suppliers.

Further information on our Sustainability Strategy and Business Plan is available [here](#).

Our business has undergone significant changes in our last financial year, and as a result we have had to ensure we adopted a period of transition to govern our decisions and ensure continuity of our dedicated operating standards. On 1st November 2023, Mace Operate announced a management buyout from the Mace Group. After 21 years as a successful facilities management services provider, Mace Operate rebranded as Macro and launched the

next generation of our business. To ensure modern slavery and human trafficking risks were prevented, detected and responded to; Macro undertook a staged exit from the Mace umbrella governance processes during the transition programme. This meant, for example, Macro continued to operate under Mace's Modern Slavery and Human Trafficking policy until June 2024 and services such as the independent whistleblowing line, which is available globally, continued to remain in place also during the staged transition programme.

2. Governance and Policies in relation to slavery and human trafficking

Our approach is to embed human rights and respect for all people across our business and supply chain. Our governance processes and responsibility for human rights and trafficking therefore starts from the top of our organisation, through our CEO and is supported by our Responsible Business Steering Committee which is supported by our Executive Leadership Team.

During our period of transition out of the Mace operating umbrella, Macro has undertaken a staged review process of all priority policies in relation to modern slavery and human rights within the financial year. This has been led by the QHSEW Director, who is the executive sponsor for Responsible Business including modern slavery and human rights.

Our policies and governance is divided into three strategic areas of our business and connected by our feedback mechanisms and steering group. During the last financial year and following the transformation of the business, Macro reviewed all existing procedures and established new processes where necessary; these are detailed below:

(1) Operational Governance and Strategy:

Area of responsibility: Ensuring leadership and governance

- [Macro 2024 Business Plan and strategy](#) – Sustainability & Compliance delivery pillars are responsible for Modern Slavery which is governed by the Responsible Business Steering Group led by QHSEW Director.

(2) Our people:

Area of responsibility: On-boarding Macro employees, setting workplace standards and raising awareness

- Code of Ethics
- Recruitment and Onboarding SOP (Regional Standards)
 - Macro Manager onboarding checklist
 - Right to Work Check (Regional Standards)
- Mandatory Induction Training – Modern Slavery and Human Trafficking (iHASCO eLearning)
- Concern Reporting Procedure (formerly known as the 'Speak Up' whistleblowing line and campaign under Mace).

(3) Our Supply Chain:

Area of responsibility: On-boarding employees, setting workplace standards and raising awareness

- Supply Chain – Supplier on-boarding manual

- Modern Slavery Guidance on Procurement
- [Macro Standard Conditions of Contract](#)
- Concern Reporting Procedure (formerly known as the ‘Speak Up’ whistleblowing line and campaign under Mace).

3. Due diligence processes

Macro is committed to undertaking reasonable steps to detect and deter the risk of modern slavery or human trafficking within their business and supply chain. The [Global Slavery Index](#) (Walk-free) provides significant evidence that human rights and modern slavery risks could be present in our industry and supply chain. We believe these risks can be strategically controlled by three key areas of our organisation (a) our leadership and governance (b) our direct employees, and (c) our global supply chain.

Identifying and managing risks across our organisation:

(1) Operational Leadership and Governance:

- Our Executive Leadership Team ensure business level reporting on modern slavery through the Responsible Business Committee. Our Committee meet Quarterly against a standard agenda which includes modern slavery performance.
- Managing risks during our Management Buy Out in 2023-2024 Financial Year.
 - During the transition from Mace, two communication and escalation email addresses were established and communicated across our stakeholders. This was to ensure any supplier or employee concerns were captured, including any modern slavery and human rights concerns.
 - Email addresses covered Legal and GDPR issues: legal@macegroup.com and GDPR@macegroup.com. This was additional to the ‘Speak Up’ whistleblowing lines which remained in place via Mace until June 2024.
 - Additional roles and responsibilities were also created within the senior management team, governed by the Executive Sponsor in the last financial year. With the new roles and responsible areas; our internal risk assessment and internal audit procedures related to modern slavery and human rights have been revised.
- To ensure our leadership remain informed of Modern Slavery risks and best practices, all our employees at Macro undertake Modern Slavery training. In 2024, Macro moved to a new eLearning platform, and thus all existing and new employees were required to re-complete modern slavery training. Our training is committed to ensuring a culture of zero tolerance on modern slavery and respect for all human rights.
- Macro operates within their clients supply chains, this also means we are subject to advanced vetting with specific customers or supplier frameworks, for example, in 2024 we completed an MSAT UK Assessment and also submit to the Crown Commercial Services (CCS) framework, which includes modern slavery requirements as part of the process.

(2) Our people (direct employees):

- Modern slavery and human trafficking mitigating controls are embedded throughout our on-boarding and employee selection processes. Our recruitment procedures ensure Right to Work checks (Regional Standards) are completed for all candidates.
- Once an employee is on-boarded, their line manager must complete our Macro Manager onboarding checklist and our Right to Work Check Form (Regional Standards).
- Mandatory modern slavery training is stipulated for all employees at induction, with take up being regularly monitored as part of our performance KPI's.

(3) Our Supply Chain:

To identify and mitigate the risks of slavery and human trafficking, Macro has focused on ensuring we maintain clear standards around supplier selection for labour, goods and services, this includes the following due diligence touch points:

- **Supplier capability survey** - though our vendor status contains three hierarchies (Preferred, Approved and Recommended), all our suppliers complete our standard capability survey which also includes criteria on modern slavery. This is our first gate in regards to supplier on-boarding. Furthermore, suppliers on our Preferred Supplier List (PSL) undergo our advanced vetting with includes further questions on modern slavery and human trafficking.
- **Macro Standard Conditions of Contract** – these formally cover our expectations in detail on ethics and modern slavery; and are mandatory for all suppliers. These are formally communicated to our supply chain during onboarding, and accessible via our web-based platform, www.macro123.com.
- **Supply Chain Standards and reporting** – the organisation ensures it's supply partners are aware of feedback mechanisms and provides clear guidance and reporting of unsafe acts or conditions through procedures designed specifically for supply chain. These are available via the accessible web-based platform and supply partners are briefed on requirements during on-boarding. All suppliers are signed onto Macro procedures during on-boarding and prior to raising of any orders.
 - Please see: [Macro Supplier Health Safety & Environmental Standards](#)
- **Account level assurance and checks** – Our procurement team provide mechanisms for account / site level quarterly performance reviews of suppliers. The question sets are owned by our subject matter and functional leads, and includes sustainability and compliance questions. These act as an open feedback mechanism on performance. The results from the internal reviews are available for our business.

4. Risk assessment and management

Macro understands that there are different modern slavery and human trafficking risks across the countries, sectors and business relationships we engage in. Being a global facilities management company, our approach to management of modern slavery and human trafficking must take into account global factors, including our global supply chain. In the last financial year, whilst still operating under the staged exit from the Mace umbrella, Macro supply chain utilised the Sedex ethical and human rights platform as an A/B Member – this enabled visibility of suppliers human rights and ethical business practices and also provided information on supply chain risks, including country heat mapping. Macro continues to utilise advice and guidance from the [Global Slavery Index](#) (Walk-free), and has developed new Modern Slavery risk assessment tools, including internal audit on corporate governance (based upon Walk-Free) and procurement heat mapping to identify high risk category spend by country.

Different supplier relationships also carry different levels of risk, and that is why we are committed to keep establishing long term relationships with supply partners under our Preferred and Recommended suppliers. This enables us to better understand our partners operations and policies and create collaborative relationships with aligned values, such as our zero tolerance on modern slavery. In the last financial year, Macro's proportional supplier spend with Preferred and Recommended suppliers was at 48%. These suppliers are also subject to additional performance evaluation and site based reviews on our client premises, with audit returns being active and accessible to all Macro employees through our internal SharePoint portals. This ensures transparency and encourages spend with high performing suppliers.

Within the UK operations, Macro also has a compliance objective to ensure a Modern Slavery Risk Assessment (MSAT) return is completed and in date. In the last financial year, an assessment was completed and improvement actions identified.

5. Key performance indicators to measure effectiveness of steps being taken

Ensuring regular monitoring and reporting is made available to leadership is a core part of the modern slavery governance processes at Macro. The Responsible Business Committee met quarterly during the last financial year, in line with their terms of reference. Modern slavery and human trafficking, which also forms part of the Macro Business Plan, is a strategic objective of the committee. The committee monitored the following KPI's from January 2023 to June 2024 (last financial year):

- Responsible Business Committee – ensuring the business holds quarterly sessions to maintain focus on modern slavery and human trafficking with a log of actions raised or escalated.
- Macro modern slavery standards and documentation – ensuring scheduled reviews of all documented procedures and policies in regards to modern slavery and human trafficking, ensuring documents were fit for purpose post transformation programme.

- Maintain accessible modern slavery standards and requirements for supply chain, and ensure documents are fit for purpose and up to date – this is demonstrated by compliant documents on the www.macro123.com portal.
- Completion of modern slavery mandatory eLearning for all Macro employees.
- Number of whistleblowing or ‘Speak up’ incidents escalated. Investigation outcomes, close out, mitigating actions, and lessons learned i.e. new business processes to prevent re-occurrences.
- Supplier Performance Monitoring – monitoring site level returns to identify any modern slavery escalations or improvement areas.

6. Training on modern slavery and human trafficking

All Macro employees: Modern Slavery Training

Macro is proud to have sourced an eLearning partner that is able to provide high level content, with a depth of understanding that is delivered in an efficient manner. Being a diverse, global organisation, having access to globally relevant content and a range of languages was imperative for us.

The iHASCO Modern Slavery course is fully approved by the Institution of Occupational Safety and Health (IOSH), CPD, IIRSM, Skills For Care, Institute Of Hospitality and available in 42 languages. The course raises awareness of the types of modern slavery, the key signs to look out for, and how to prevent, tackle and report.

The course includes two sections, one to educate users on types of modern slavery and the second designed to educate users on how to speak up, plus take rightful actions should they identify modern slavery in the workplace. The course has a multiple choice exam, with a minimum pass mark of 70%. Current completion rate in Macro in the last financial year was 89%.

7. Priority Plan – 2024/25 Financial Year

The previous financial year was focused upon stabilising the business during a period of great change. All policies and procedures had to be reviewed, new processes and systems established with supply chain teams and internal reporting mechanisms and data reporting systems were designed. The 2024/25 financial year will be focused upon ensuring Macro continues to embed modern slavery and human trafficking prevention, detection and response across our business and supply chain.

Planned Action:

- Review the UN Guiding Principles for Business and Human Rights with a view to adopt the standards.
- Modern Slavery Risk Assessment
 - Review the MSAT (UK Government).
 - Review the procurement heat mapping and establish an improvement plan.
- Modern slavery KPIs – we will review our existing Modern Slavery KPI's and establish new metrics where required to align to our new business operating standards.
 - Continue to monitor modern slavery training completion across the organisation (targeting 100% completion by end June 2025).
 - Refresh and communicate our Code of Ethics to all employees and suppliers which includes Modern Slavery and how to report a concern.
 - Suppliers with modern slavey statements (% spend / no.) - Work with our suppliers to ensure that modern slavery or human trafficking is not taking place within our business or within our supply chains. Encourage our supply chain to develop their own ESG programs and commitments and growing our % spend with ethical, diverse and sustainable suppliers.
 - Incident reporting, Incident investigations and learning (all incidents to be formally investigated) - Continue to monitor concern reporting and re-launch a communication programme so all stakeholders are made aware of the new process.
- Strengthen internal assurance processes –
 - Leadership and corporate governance audits – annual modern slavery audit against Walking Free methodology.
 - Employee Records – conduct audit of employee records against Right to Work. Review the need for Right to Work checks within supply chain.
 - Procurement team – country / category buyer training
 - Establish training around key risks identified via the procurement heat mapping. Develop more detailed guidance for procurement team.

This statement was approved by:

Rosario Abbate
Chief Executive Officer

Date: 19th December 2024