

Modern Slavery Statement

This statement defines the approach that Macro Group Limited (Macro) and its subsidiaries have taken to comply with the Modern Slavery Act (2015) in the reported financial year, plus the planned actions in the 2025/26 financial year, to prevent, detect and respond to modern slavery risks within our business and supply chain. This statement will remain active until the next financial year.

Macro Group structure and supply chain

Macro is a global facilities management and workplace services company. We serve our clients' global facilities portfolios 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 700 people worldwide and operated in over 49 countries. We are a privately owned and unquoted company governed by a board and chairman, and an executive management team of directors.

In our 2024/25 financial year, our supply chain spend was over £90m 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:

- Work with our suppliers to reduce the risk that modern slavery or human trafficking takes place within our business or within our supply chains, to as low as reasonably practicable.

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

Governance and Policies in relation to modern slavery

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

For simplicity and consistency, this statement uses the term **“Modern Slavery”** to encompass modern slavery, human trafficking, and related human rights abuses.

Our policies and governance are divided into three strategic areas of our business and connected by our feedback mechanisms and steering group, which are detailed below:

Operational Governance and Strategy:

Area of responsibility: Ensuring leadership and governance

- [Macro Business Plan and strategy](#) – Sustainability & Compliance delivery pillars are responsible for Modern Slavery, which is governed by the Responsible Business Steering Group led by the QHSEW Director, held quarterly
- Modern Slavery working group – consists of representatives from QHSEW, Sustainability, HR and Supply Chain Management teams, who meet monthly (newly established in December 2025)

Our people:

Area of responsibility: Onboarding 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 (iHASCO eLearning)
- Concern Reporting Procedure (also known as the ‘Speak-up’ line)

Employee consultation and feedback procedures – to ensure our business and people have access to a series of feedback mechanisms and touchpoints

- Our ‘This is Me’ campaign
- Employee satisfaction survey
- Inclusion and Respect at Work Policy
- Grievance Policy

Macro employee rights to join trade unions or workers' associations through recognition, and ensure workers' interests are adequately represented

Our Supply Chain:

Area of responsibility: Onboarding new suppliers, setting workplace standards and raising awareness

- Supply Chain – Supplier onboarding manual
- [Macro Standard Conditions of Contract](#)
- Concern Reporting Procedure

Due diligence processes

We are committed to undertaking reasonable steps to detect and deter the risk of modern slavery within our 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:

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.

This year, we have conducted internal Modern slavery assessments against our modern slavery assessment standard based upon Walk-Free guidance. We have focused our internal assurance programme on our priority departments and regions: People (HR), QHSEW processes and management system standards, supply chain standards and processes and finally a focus on MENA People and Supply Chain teams, as a high-risk region.

We also operate within our clients' supply chains. This also means we are subject to advanced vetting with specific customers or supplier frameworks. For example, in 2025, we continued to complete an MSAT UK Assessment and submit to the Crown Commercial Services (CCS) framework, which includes modern slavery requirements as part of its standards.

Our people (direct employees):

Modern slavery mitigating controls are embedded throughout our onboarding 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 (including leadership) at induction and every 2 years, with take-up being regularly monitored as part of a performance KPI.

Our Supply Chain:

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

- **Supplier Vetting & Onboarding** – we vet our suppliers according to our onboarding process that includes financial & legal checks, quality health, safety and environmental checks, insurance checks and a requirement for suppliers to confirm their commitment to the Modern Slavery Act.
- **Supplier Capability Survey** - We conduct a capability survey of all Preferred and Recommended suppliers (known as our PSL – Preferred Supplier List). This checks their ESG commitments, including whether they also have a modern slavery statement. To date, 99 PSL suppliers have confirmed they have a Modern Slavery Statement.
- **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 are accessible via our web-based platform, www.macro123.com. Our standard terms of contract require our supply chain partners to comply

fully with the UK Modern Slavery Act, our Modern Slavery statement, and to report to Macro immediately they become aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with any business with Macro. Please also see: [Macro Supplier Health, Safety & Environmental Standards](#)

- **Account-level assurance and checks** – Our procurement team provides mechanisms for account / site-level quarterly performance reviews of suppliers. The question sets are owned by our subject matter and functional leads and include sustainability, H&S and compliance questions. These act as an open feedback mechanism on performance. The results from the internal reviews are available for our business.

Risk assessment and management

We understand that there are different modern slavery risks across the countries, sectors and business relationships we engage in. Being a global facilities management company, our approach to management of modern slavery must consider global factors, including our global supply chain. We utilise guidance from the [Global Slavery Index](#) (Walk-Free), and have developed new Modern Slavery risk assessment tools, including an 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 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 for modern slavery. In the last financial year, Macro's proportional supplier spend with Preferred and Recommended suppliers (PSL) was at 53%. These suppliers are also subject to additional performance evaluation on our client premises, with audit returns being active and accessible to all Macro employees through our internal Prism SCM Dashboards. This ensures transparency and encourages spending 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 annually. In the last financial year, an assessment was completed and improvement actions identified.

Key performance indicators to measure the effectiveness of the steps being taken

Ensuring regular monitoring and reporting are 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 and kept minutes and an action log, in line with the terms of reference. Modern slavery forms part of the Macro Business Plan and is a strategic objective of the committee. The committee monitored the following KPI's (last financial year):

- Completion of the modern slavery mandatory eLearning for all Macro employees.
- Macro modern slavery policies and procedures – ensuring scheduled reviews regarding modern slavery, ensuring documents were fit for purpose post transformation programme.
- Maintain accessible modern slavery requirements for the 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.
- Number of 'Concern Reports' (whistleblowing) received. Investigation outcomes, close out, mitigating actions, and lessons learned, i.e. new business processes to prevent re-occurrences.

Training on modern slavery

All Macro employees - We assign modern slavery training to all employees and contingent workers (both part-time and full-time) to be completed every 2 years. We have also linked the completion of this course to the annual performance appraisal process, meaning an employee can only receive a satisfactory rating if they have completed this.

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 is 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 and 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%.

Our current completion rate in the last financial year was 92%.

Supply Chain Management team - This year, we developed and delivered an in-house modern slavery training in December 2025 for our supply chain management team and our QHSEW team.

Priority Plan – 2025/26 Financial Year

The financial year will focus on continuing to embed modern slavery violation prevention, detection and response across our business and supply chain and improving communication across our global supply chain.

Planned Actions:

- Review the UN Guiding Principles for Business & Human Rights with a view to adopting the standards.
- Modern Slavery Risk Assessment
 - Review the MSAT (UK Government).
 - Review the procurement heat mapping and establish an improvement plan.
- Modern slavery KPIs:
 - Continue to monitor modern slavery training completion across the organisation.
 - Refresh and communicate our Code of Ethics to all employees and suppliers, which includes Modern Slavery and how to report a concern.
 - Enhance new supplier briefing to include code of ethics and modern slavery requirements, together with the briefing on Supplier Minimum HSE Standards
 - Track the number and % spent by suppliers with modern slavery statements
 - Continue to monitor concern reporting (whistleblowing).
- Continue to strengthen internal assurance processes
 - Leadership and corporate governance audits – conduct an annual modern slavery audit against the Walking Free methodology.
 - Employee Records – conduct an audit of employee records against Right to Work. Review the need for Right-to-Work checks in the supply chain.
 - Procurement team – country/category buyer training
 - Continue to develop internal training around key risks identified via the procurement heat mapping. Develop more detailed guidance for the procurement team.

For and on behalf of Macro Group Limited



Rosario Abbate | Chief Executive Officer