

Anti-Slavery and Anti-Bribery Policy

1. Introduction

Macro Global (“the Company”) is committed to conducting its business with the highest standards of integrity, fairness, and responsibility. We have a zero-tolerance approach to bribery, corruption, modern slavery, and human trafficking in all their forms.

This Policy consolidates our commitments under:

- The UK Bribery Act 2010, and
- The UK Modern Slavery Act 2015.

It applies to all directors, officers, employees, workers, contractors, consultants, suppliers, agents, and any other third parties associated with the Company, across all jurisdictions in which we operate.

Failure to comply with this Policy may constitute gross misconduct and could result in disciplinary action, including dismissal, termination of contracts, reporting to regulators, and referral to law-enforcement authorities.

2. Scope of the Policy

This Policy covers:

- All global operations of Macro Global.
- Our supply chains, including technology providers, cloud hosting partners, consultants, and other service partners.
- All business partners, joint ventures, and agents acting on our behalf.

3. Anti-Slavery & Human Trafficking

We are committed to preventing slavery, forced labour, child labour, and human trafficking within our business and supply chains.

3.1 Key Commitments

- Recruitment: Fair and transparent hiring processes; no fees charged to jobseekers; strict prohibition of exploitative practices.
- Supply Chain: Suppliers and contractors must comply with all applicable laws, including the Modern Slavery Act 2015, and align with our Supplier Code of Conduct.

- Whistleblowing: Employees and third parties can raise concerns confidentially through our Whistleblowing Policy without fear of reprisal.
- Contractual Controls: Supplier and partner contracts contain clauses requiring compliance with anti-slavery and human-trafficking laws.

3.2 Risk Assessment & Due Diligence

- Risk assessments are conducted during supplier onboarding and renewal.
- Higher-risk sectors and geographies are subject to enhanced due diligence.
- Ongoing monitoring and reviews ensure continued compliance.

3.3 Training & Awareness

- Relevant employees receive training on recognising and reporting modern slavery.
- Senior management reinforces a zero-tolerance culture across the organisation.

4. Anti-Bribery & Corruption

Bribery is defined as offering, giving, receiving, or soliciting a financial or other advantage to induce improper performance of duties.

4.1 Prohibited Conduct

- Making or receiving facilitation payments, kickbacks, or secret commissions.
- Offering or accepting bribes to secure contracts, orders, or favourable treatment.
- Providing improper gifts, hospitality, or entertainment intended to influence business decisions.
- Turning a blind eye to unsafe practices, poor performance, or false reporting in exchange for a benefit.

This prohibition applies globally, regardless of local customs or practices.

4.2 Permitted Conduct

The following are acceptable when appropriate, proportionate, transparent, and properly recorded:

- Reasonable and bona fide hospitality or gifts that are not intended to influence business outcomes.
- Transparent fast-tracking of a service that is equally available to others upon payment of a published fee.

- Providing resources to enable fair and efficient decision-making without creating undue influence.

4.3 Due Diligence on Suppliers & Partners

Before entering into agreements, the Company will assess whether a supplier, agent, or partner may present a bribery or corruption risk. Factors include:

- Nature and location of their business.
- Involvement with public officials or tendering processes.
- Their own anti-bribery policies and reputation.

Suppliers and partners must acknowledge and comply with this Policy as a condition of doing business with us.

5. Reporting and Whistleblowing

Any suspected case of bribery, corruption, slavery, or trafficking must be reported immediately via the Company's Whistleblowing Policy.

- Reports will be taken seriously, investigated promptly, and treated confidentially wherever possible.
- No retaliation will be taken against any person who reports concerns in good faith.
- Malicious or bad-faith reporting may itself be treated as misconduct.

6. Monitoring & Review

The Company will:

- Monitor compliance across all operations and supply chains.
- Review and update this Policy and related procedures annually.
- Publish its Modern Slavery Statement each financial year, in line with legislative requirements.
- Take corrective actions against breaches, including termination of contracts or disciplinary measures.

7. Responsibilities

- Board of Directors: Overall accountability for ensuring compliance.
- Senior Management: Implementation and enforcement within their teams.
- Employees & Associates: Individual responsibility to act ethically, comply with this Policy, and report concerns.

8. Approval

This Policy has been approved by the Board of Directors of Macro Global and is effective from 15 March 2025. It will be reviewed annually and re-issued as required.



Signed: _____

Name: [Saravanan Panneerselvam]

Position: Director

Date: 27 August 2025