



# Modern Slavery and Human Trafficking Policy

Make Ltd ('Make') is an international architectural practice with offices in London, Hong Kong and Sydney. Our supply chain is worldwide and not limited geographically to cities with our offices.

Make is committed to ethical trading principles and recognises modern slavery and human trafficking as a crime and fundamental violation of human rights. This policy sets out the obligations of Make, and individuals related to it, in respect of Make's continued effort to combat slavery and human trafficking and carry out its business ethically and with integrity.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

The policy does not form any part of any employee's contract of employment, and consequently we may amend it at any time.

## Responsibility

Ultimate responsibility for the prevention of modern slavery rests with the Board of Directors at Make Ltd ('the Board'). The Board has the overall responsibility for ensuring that this policy and its implementation comply with our legal and ethical obligations. HR is responsible for informing the Board of any legal updates and reviews to this policy.

## Commitments

Make expects all those individuals covered by this policy to read, understand and comply with this policy.

Individuals are expected to avoid any activity which may breach this policy, and you are encouraged to raise any suspected breach of this policy, or any other suspicions in relation to modern slavery or human trafficking, to your project leader or a director in the first instance.

Make expects subconsultants and suppliers working with us, or on our behalf, to support and uphold the same measures to safeguard against modern slavery, that Make does. These are:

- A zero-tolerance approach to modern slavery.
- The prevention, detection and reporting of modern slavery in any part of our project-related supply chain. This is the responsibility of all those working for us or on our behalf.
- Partners must not engage in, facilitate or fail to report any activity that might lead to or suggest a breach of this policy.
- A risk-based approach to our contracting processes, which must be kept under review. We assess whether the circumstances warrant the inclusion of specific

prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to enter into an Anti-Slavery Agreement with us.

- Audits, where circumstances warrant, of suppliers and/or contractors for their compliance with Modern Slavery Statement, as part of our ongoing risk assessment and due diligence processes.
- Appropriate action should we find that other individuals or organisations working on our behalf have breached this policy. This may range from considering the possibility of breaches being remediated, (and whether that might represent the best outcome for those individuals impacted by the breach) to terminating such relationships.

## **The Right to Work in the UK**

We have a duty to prevent illegal working. This includes of Makers, agency workers and self-employed contractors. Under Sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006 ('The Act') it is illegal to employ someone who does not have a valid and up to date right to work in the UK. Under section 35 of the Act an employer is committing an offence if they know or have reasonable cause to believe that their employee does not have the right to work in the UK.

Prior to the start date and time of employment we are required to obtain proof of an individual's right to work. This could be through an online, manual or Covid adjusted check\*. We follow the guidance provided in the right to work checklist which can be found [here](#). The HR team are responsible for carrying out these checks and storing this information.

*\*Appendix D includes adjusted checks in light of Covid and the inability to see original documents.*

Once this information is obtained it is saved in their electronic file and notes in the HR system to enable reporting. Where someone is on a timebound visa reminders will be put in diaries to ensure all new documents are checked in line with guidance. Any documents obtained will be kept for a minimum of two years after employment has ended.

An audit is carried out by the HR team at least once a year and we also instruct Bates Wells to provide immigration advice as required.

## **Training**

New starters will undergo training on this policy during their induction with HR on their first day. Current team members will be made aware of where the most up-to-date policy and statements are. Any partner may request further training on this policy, and this will be provided in a timely manner. Any updates to this policy or statement will be communicated to all partners.

## Reporting

*Internal* – Partners are encouraged to raise any questions or concerns about suspected modern slavery with their project lead, a director or HR.

*External* – Any external individuals and/or groups that may have a concern regarding modern slavery relating to any part our business or supply chain are encouraged to write to the registered Make London office.

These reports will be taken in good faith by the Board and will be looked into further. The Whistleblowing Policy will protect and safeguard any person/s that report an act of modern slavery. Make is committed to ensuring that nobody suffers any detrimental treatment as a result of raising concerns in good faith about modern slavery and human trafficking.

## Breaches of this policy

If there is a breach of this policy, we reserve the right to terminate our relationship with individuals and organisations in our supply chain.

Any employee of Make that breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

## Communication and awareness

Our zero-tolerance approach to modern slavery will be communicated to all project related suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## Review

Following its initial adoption, this Modern Slavery Policy will be reviewed by HR on a regular basis (at least annually) and may be amended from time to time.

Authorised by:



Ken Shuttleworth