

## **Modern Slavery & Human Trafficking Statement**

**July 2024**

### **Introduction:**

At Makor Securities London Limited ("**Makor**"), we are committed to combating modern slavery in all its forms. This statement is issued in accordance with the Modern Slavery Act 2015 ("**MSA 2015**") and outlines the steps we have taken to prevent modern slavery within our organization and supply chains. We strive to uphold the highest standards of ethical conduct, human rights, and labour practices across our operations.

### **Organisational Structure and Supply Chains:**

Makor is a financial services brokerage providing bespoke execution and advisory services to leading institutional investors. We operate globally, with key locations in the UK, US, France, Dubai, Israel and Singapore. In our role as a regulated intermediary in the financial markets, we consider that there is a minimised risk of modern slavery occurring in our core business. Notwithstanding this, we remain committed to ensuring that there is no modern slavery or human trafficking in any part of what we do. Due to the minimised risk within our core activities, we have therefore focussed on external suppliers to Makor, e.g. professional or advisory suppliers; technology service providers, etc. Our key suppliers tend to be major providers of telecoms, IT, market data and professional services, located in the UK, Europe and the US.

### **Policies and Procedures:**


Makor has Group-wide policies and governance processes that of themselves assist in ensuring compliance with our MSA 2015 duties. For example:

- Anti-Slavery and Human Trafficking Policy;
- Employee Handbook, which aims to cultivate a workplace environment that is fair, open and respectful, and one that promotes and protects the rights of all staff.
- Risk Assessment: we conduct thorough assessments of potential and existing suppliers to identify areas of potential risk for modern slavery. This assessment enables us to focus our efforts on high-risk areas and take appropriate measures to mitigate those risks.
- Due Diligence: we perform due diligence on all new suppliers and business partners to evaluate their compliance with our ethical standards. This process includes reviewing their policies, practices, and labour conditions to ensure they align with our commitment to preventing modern slavery and looking to include our model contractual requirements on modern slavery within any supplier contractual arrangements.

- Training and Awareness: We provide regular training to our employees and key stakeholders to raise awareness about modern slavery, its indicators, and reporting mechanisms. By equipping our workforce with the knowledge to identify and address potential instances of modern slavery, we empower them to take appropriate action.
- The Whistleblowing procedure contained in the Compliance Manual, which details how staff may report any concerns including any related to any matter whatsoever of public significance, including modern slavery/trafficking.
- The Makor Code of Conduct: which sets the standards that are expected to be maintained at all levels of our business.

**Conclusion:**

At Makor, we remain steadfast in our commitment to preventing modern slavery and ensuring that our operations and supply chains are free from exploitation. This statement reflects our ongoing efforts to eradicate modern slavery and demonstrates our dedication to upholding human rights and ethical practices. We will continue to review and enhance our strategies to combat modern slavery, taking into account evolving legal requirements and industry best practices.

Signed:  DocuSigned by:  
8650F9305146424...

**Avi Bouhadana, Director**

## **MODEL MODERN SLAVERY ACT COMPLIANCE CLAUSE FOR SUPPLIERS**

### **1. Compliance with Laws and Policies**

In performing its obligations under the agreement, the Supplier shall and shall ensure that each of its subcontractors shall:

- 1.1 comply with all applicable laws, statutes, regulations in force from time to time including but not limited to the Modern Slavery Act 2015 (the "**MSA 2015**"); and
- 1.2 take reasonable steps to ensure that there is no modern slavery or human trafficking in the Supplier's or any subcontractor's supply chains or in any part of their business.

### **2. Due Diligence**

- 2.1 The Supplier represents and warrants that neither the Supplier nor any of its officers, employees or other persons associated with it has been convicted of any offence involving slavery and human trafficking, and, to the best of its knowledge, has been or is the subject of any investigation, inquiry or enforcement proceedings by authority regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- 2.2 The Supplier shall implement due diligence procedures for its own suppliers, subcontractors and other partners and providers to ensure that there is no slavery or human trafficking in its supply chains.

### **3. Reports**

The Supplier shall notify Makor as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with this agreement.

### **4. Confirmation of Compliance with Modern Slavery Act 2015**

The Supplier represents, warrants and undertakes that it conducts its business in a manner that is consistent with the principles of the Modern Slavery Act 2015.

### **5. Termination**

Notwithstanding anything to the contrary in this agreement, Makor may terminate the agreement with immediate effect by giving written notice to the Supplier if the Supplier commits a breach of this Clause, with such breach being considered a material and irremediable breach hereof.