



# ANTI MODERN SLAVERY & HUMAN TRAFFICKING POLICY



THIS POLICY IS APPLICABLE FOR THE MANAGEMENT AT ALL LEVELS, EMPLOYEES AND ALL THOSE WORKING FOR EURO SME SDN BHD, MALAYSIA & EURO NATURE GREEN, MALAYSIA.

EURO SME SDN AND EURO NATURE GREEN ENDORSE THAT MODERN SLAVERY IS A CRIME AND A VIOLATION OF FUNDAMENTAL HUMAN RIGHTS WHICH IS CONSTITUTED IN MODERN SLAVERY ACT 2015 (MALAYSIA). IT TAKES VARIOUS FORMS, SUCH AS SLAVERY, SERVITUDE, FORCED AND COMPULSORY LABOR AND HUMAN TRAFFICKING, ALL OF WHICH HAVE IN COMMON THE DEPRIVATION OF A PERSON'S LIBERTY BY ANOTHER IN ORDER TO EXPLOIT THEM FOR PERSONAL OR COMMERCIAL GAIN.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**


WE ARE COMMITTED TO ENSURING THAT THERE IS NO SLAVERY OR HUMAN TRAFFICKING IN ANY PART OF OUR BUSINESS AND. OUR PROCEDURES REFLECT OUR COMMITMENT TO ACTING ETHICALLY AND WITH INTEGRITY IN ALL OF OUR BUSINESS RELATIONSHIPS AND TO IMPLEMENTING EFFECTIVE SYSTEMS AND CONTROLS TO ENSURE SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE ANYWHERE IN OUR BUSINESS.

## **DUE DILIGENCE PROCESSES AGAINST SLAVERY AND HUMAN TRAFFICKING**

TO MITIGATE AGAINST SUCH RISK, WE HAVE IMPLEMENTED A MODERN SLAVERY PROCEDURE THAT HELPS US TO IDENTIFY INAPPROPRIATE EMPLOYMENT PRACTICES. WE HAVE ZERO TOLERANCE TO SLAVERY AND HUMAN TRAFFICKING WITHIN OUR BUSINESS ORGANIZATION.

DIRECTOR OPERATIONS



	<b>STANDARD OPERATING PROCEDURE</b>	Doc No. : EPQ-HR-014
	NO FORCED LABOUR	Rev No : 00 Effective Dt : 10/11/2017 Next Review Dt : 10/11/2019 Page : 2 of 2

#### 1.0 PURPOSE

The purpose of this document is to provide clear instructions to stakeholders to better prevent the recruitment of forced labour.

#### 2.0 SCOPE

This procedure covers action to safeguards against forced labour.

#### 3.0 RESPONSIBILITY

All stakeholders, especially Recruitment Manager, HR personnel and Heads of Department.

#### 4.0 DEFINITION

Forced Labour – Includes work or service exacted from a person under threat or penalty (or where the person has not offered him or herself voluntarily), slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage, domestic workers under forced labour situations, and internal or international human trafficking for labour or sex purposes, which includes slavery or practices similar to slavery.

#### 5.0 PROCEDURES

- Take steps to ensure that all work is carried out voluntarily and as per job description
- If fees are charged to workers either directly or by recruitment agencies (including for travel or accommodation), make sure that they are appropriate, in line with market levels and do not prevent the worker from leaving employment because they cannot pay off the fees
- Euro SME only uses legitimate and reputable recruitment and employment agencies
- The company will vet through and check their practices and policies and where necessary past records of successful hiring will be required from the agencies.
- If workers' documents are kept in a secure place, ensure that workers have free access to them upon seeking permission from their immediate superiors or leaders
- The company ensures that workers are free to leave the worksite, subject to appropriate security, logistical or other restrictions
- Ensure that any non-cash benefits (e.g. meals, housing, and transportation) are valued appropriately and do not impose substantial debts on workers.
- Euro SME do not employ and/or use prison labour without guarantees that it is voluntary (e.g. formal written consent) and ensure that prison labourers are paid and treated the same as non-prison workers
- Overtime shall be paid for any work done and is within national legislation
- Euro SME does not practice and condone any work that is compelled by threats, including the threat of dismissal amongst the workers
- All workers are subjected to Euro SME's disciplinary process which is based on prevailing Malaysian Labour Law

#### 6. RELATED RECORDS

Signed Offer Letter and Declaration Forms

**MASTERCOPY**



	<b>STANDARD OPERATING PROCEDURE</b>	Doc No.: EPQ-HR-017
	<b>MODERN SLAVERY PREVENTION</b>	Rev No.: 00
		Effective Date: 23-Mar-2020
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## 1.0 PURPOSE

The purpose of this is to stress that EURO SME SDN BHD has a zero- tolerance policy against Modern Slavery as prohibited by Malaysia Employment Act. Modern Slavery is viewed as a major offence and is a crime and a violation of fundamental human rights which is constituted in the Modern Slavery Act 2015. It takes various forms such as forced labour, slavery and human trafficking all of which are considered to be abuses of a person's freedoms and rights. Euro SME Sdn Bhd is committed to tackling modern slavery in its operations worldwide. We are dedicated to improving our practices to combat modern slavery and to ensure it does not take place in any of our business. We strive to ensure all operations are conducted in an ethical manner and with integrity

## 2.0 SCOPE

2.1 This procedure covers:-

- definition of modern slavery
- procedures related to determining modern slavery

## 3.0 RESPONSIBILITY

3.1 It will be the responsibility of EURO SME SDN BHD's HR Department to ensure the sourcing of new candidates and suppliers are under their direct control. All due diligence will be carried out in order to comply with our values. We have a stringent procedure where we work with when it comes to new placements and taking on of new suppliers. To ensure all those comply with our values, when entering new contract, where possible, we include contractual provisions for ensuring compliance with all relevant acts combatting modern slavery.

## 4.0 DEFINITION

4.1 "Modern Slavery" is the severe exploitation of other people for personal or commercial gain. Modern slavery is all around us, but often out of sight. From the outside it can look like a normal job (working in factory) but in actual, people are controlled – they can face violence or threats, be forced into inescapable debt or have had their passport taken away and are being threatened with deportation. Many have fallen into this oppressive trap simply because they are often trying to escape poverty and now they can't leave.

## 5.0 PROCEDURES

5.1 We have developed a New Supplier Registration Form where the suppliers will need to fill and provide all related documents in consisting of this following approach:

- Initial appraisal of the agency or supplier with focus on practices relevant to modern slavery and thereafter scheduled updates and audits.

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- Assessment of assigned temporary workers details by verifying details provided such as address and bank account names before accepting them on site.
- Regular documented checks on existing temporary workforce including review of contracts, payslips and interviews.

We continue to be engaged in permanent dialogue with the approved labour providers, while regular temporary workforce sessions are held to empower and allow workers to voice any concerns (JCC Meeting).

## 6. RELATED RECORDS

6.1 EURO SME SDN BHD - Human Resource department has records of each employees joined which include age verification documents that are available.

## 7. RISK INVOLVING MODERN SLAVERY

7.1 We have reviewed our business model and have concluded we are at low risk of modern slavery occurring with our suppliers and workers. This is due to the nature of niche roles we place that are for un-skilled workers and well paid (in accordance to the minimum wage). The Human Resource department have full control and clear visibility of the candidates and suppliers we place. We constantly play our role by allowing the workers to come and speak to us freely and that there is no signs of modern slavery.

## 8. MONITORING & COMPLIANCE

To ensure the risk of modern slavery, we have together aligned other policies such as :

- No Forced Labour Policy
- No Child Labour Policy
- Equal Employment Opportunity Policy
- Whistleblowing Policy
- Anti-bribery and Corruption Policy

To ensure the risks of modern slavery and human trafficking in our business are understood, we continuously include training session quarterly for our new staff. Our Modern Slavery Act Policy has been sent around to the business globally to ensure awareness and is also available in our internal database to access at any time.