

## **Anti Slavery & Anti Human Trafficking Policy at EMC LIMITED.**

EMC LIMITED strictly prohibits the use of forced labour and human trafficking in all Company Operations and in our Global Supply Chain.

### **Bonded Labour / Slavery:**

The ILO defines forced labour as work or service exacted from a person under threat or penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered him or herself voluntarily. It includes slavery and abduction, misuse of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, and internal or international trafficking. Forced or compulsory labour is now almost universally banned, and two ILO Conventions - the Forced Labour Convention, 1930 (No. 29) and Abolition of Forced Labour Convention, 1957 (No. 105) - are the most widely ratified of all International Labour Conventions. Specific prohibitions of forced labour have also been incorporated in the labour codes or general employment legislation of many countries.

### **Human Trafficking:**

Global efforts to control human trafficking has led to a number of new international anti-trafficking instruments, the most noteworthy of which is the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, (the “Palermo Protocol”), which supplemented the United Nations Convention against Transnational Organized Crime (2000), and the Council of Europe Convention on Action Against Trafficking in Human Beings (2005). The Palermo Protocol contains the following definition of trafficking, which is now almost universally accepted: “Trafficking in persons” shall mean the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”

We say “no” to exploitative labour practices and to any associated criminal conduct.

### **Standard Operating Procedures:**

EMC LIMITED has in place a Code of Conduct and our Workplace Standards is modelled on International Human Rights Law and International Labour Rights Conventions. Our Workplace Standards prohibits our Business Partners from making our products “using forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.”

All suppliers to EMC LIMITED are required to sign a Manufacturing or Supplier Agreement which confirms their commitment to compliance with the EMC LIMITED Workplace standards, including the prohibition of any type of forced labour. These legal agreements must be signed by an officer of the supply company. Signed agreements must be in place before any production orders are placed with a supplier. We have a global inspection team (Social and Environmental Affairs) which monitors our suppliers’ workplace conditions. We audit those workplaces for unfair employment practices and any potential situation of exploitation, including forced labour. When there are noncompliant activities, we work with the factory to develop and execute corrective action. There are more than 1000 audits and monitoring visits by the EMC LIMITED’s SEA team annually, and they include both announced and unannounced visits.

EMC LIMITED’s compliance programme and supply chain is the subject of independent checks and validation by KVQA Certification. KVQA Certification evaluates EMC LIMITED’s programmatic activities for compliance with forced labour code elements and selectively audits our supply chain to ensure compliance with ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007 standards.

**Training, Guidance & Accountability:**

To support our Workplace Standards, EMC LIMITED has developed and trained our suppliers on a set of Guidelines on Employment Standards. Suppliers who consistently or deliberately fail to meet compliance standard for slavery and trafficking breach the terms of the Manufacturing or Supplier Agreement and the commercial relationship could be terminated.

The EMC LIMITED’s staff and management in social and environmental affairs, purchasing, sourcing, product creation, legal services, licensing, and other departments are regularly briefed on the Workplace Standards and trained to manage compliance risks throughout the supply chain. The Workplace Standards state that “using forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.” All Group



departments work closely with suppliers to correct any breaches of employment, health, safety and environmental precedent and practices, and specifically for any type of forced labour. If employees of the EMC LIMITED who are responsible for the Workplace Standards fail to fulfil their duties, they may be subject to discipline.

Annually, we continue our intensive efforts to provide training for our suppliers, licensees and employees from the EMC LIMITED's operational departments. We have three main types of training: Fundamental training, Performance training, and Sustainability training. Our programmatic activities for auditing, monitoring, training, and rating our supply chain as well as the verification works by KVQA is described in our annual Sustainability Reports.

We have worked closely with local non-government organizations in safeguarding the rights of migrant workers who have found employment within our supply chain. This has included the development of guidance and industry best practice to eliminate the exploitative actions of middle men and unscrupulous employment agencies and ensuring freedom movement and employment of transnational migrant workers.