

# Markit Systems Ltd

## Modern Slavery Policy

Date Created

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Reviewed by

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Approved by

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### 1. Policy overview

1.1 This Modern Slavery policy exists to set out the responsibilities of Markit Systems Ltd and those who work for them in regards to observing and upholding Markit Systems' zero-tolerance position on Modern Slavery.

1.2 Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour and human trafficking. These all include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.3 This policy also exists to act as a source of information and guidance for those working for Markit Systems Ltd. It helps them recognise and deal with Modern Slavery issues, as well as understand their responsibilities.

## **2. Scope**

2.1 This policy applies to all employees (whether temporary, or permanent), no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

## **3. Policy statement**

3.1 Markit Systems Ltd is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure Modern Slavery is prevented. Markit Systems Ltd has zero-tolerance for Modern Slavery activities. Markit Systems Ltd are committed to acting professionally, fairly and with integrity in all business dealings and relationships, in whichever country we operate, to ensure modern slavery is not taking place within the business or in any of its supply chains.

3.2 Markit Systems Ltd will constantly uphold all laws relating to Modern Slavery in all the jurisdictions in which they operate. Markit Systems Ltd is bound by the laws of the UK, including the Modern Slavery Act 2015, in regards to their conduct both at home and abroad.

## **4. Employee responsibilities**

4.1 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4.2 Every employee of Markit Systems Ltd must ensure that they read, understand, and comply with the information contained within this policy, and with any training or other Modern Slavery information they are given.

4.3 All employees are equally responsible for the prevention, detection, and reporting of Modern Slavery or exploitation. They are required to avoid any activities that could lead to, or imply, a breach of this Modern Slavery policy.

## **5. What happens if an employee needs to raise a concern?**

### **5.1 How to raise a concern**

5.1.1 If an employee suspects that an instance of Modern Slavery or exploitation has occurred or will occur in the future that breaches this policy, they must notify their line manager and the compliance manager.

5.1.2 If an employee is uncertain about whether a certain action or behaviour can be considered as Modern Slavery, they should speak with their line manager and the Compliance Manager.

5.1.3 Markit Systems Ltd will familiarise all employees with its reporting procedures so employees can vocalise their concerns swiftly and confidentially. Please refer to

Markit Systems' Disclosure of Malpractice in the Workplace Policy.

5.1.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Markit Systems Ltd has the right to terminate a contractual relationship with an employee if they breach this Modern Slavery policy.

5.1.5 If an organisation in Markit Systems' supply chain, or an organisation with which Markit Systems Ltd has a relationship with, breaches this policy Markit Systems Ltd may terminate their contract or relationship with them effective immediately.

## **5.2 Protection**

5.2.1 Markit Systems Ltd encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Markit Systems Ltd is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of Markit Systems' supply chains.

5.2.2 Markit Systems Ltd will ensure that no one suffers any detrimental treatment as a result of reporting a concern relating to potential act(s) of Modern Slavery or exploitation.

5.2.3 Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.

5.2.4 If an employee has reason to believe that they have been subjected to unjust treatment as a result of raising or reporting a concern they should inform their line manager or the compliance manager immediately.

## **6. Training and communication**

6.1 Markit Systems Ltd will provide training as necessary on this policy as part of the induction process for all new employees. Annually employees will be resent this policy, amongst others, and are expected to refamiliarise themselves and comply with all themes.

6.2 Training on this policy, and on the risk the business faces from modern slavery in its supply chains, will be provided as necessary.

6.3 Markit Systems' zero-tolerance approach to modern slavery will be communicated to all supplier and business partners at the outset of their business relationship with them and reinforced as appropriate thereafter.

## **7. Monitoring and reviewing**

7.1 Markit Systems' Compliance Manager is responsible for monitoring the

effectiveness of this policy and will review the implementation of it on an annual basis. They will assess its suitability, adequacy and effectiveness.

7.2 Any identified need for improvement will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Compliance Manager.

7.3 This policy does not form part of an employee's contract of employment and Markit Systems Ltd may amend it at any time so as to improve its effectiveness at combating Modern Slavery and exploitation.

## **8. Related Policies**

8.1 This Modern Slavery Policy interacts with the following workplace policies. Employees are encouraged to familiarise themselves with the policies detailed below. If an employee has any queries about this policy, please contact the compliance manager.

- Markit Systems Ltd Safeguarding Policy
- Markit Systems Ltd Disclosure of Malpractice in the Workplace (Whistleblowing) Policy
- Markit Systems Ltd Code of Conduct