

# Anti-Slavery and Human-Trafficking Statement

Financial Year 2020/21

1. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that the NoteMachine Group of Companies has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
2. This policy applies to all employee’s, third parties, suppliers and contractors who provide services to, or on behalf of the NoteMachine Group and its subsidiary companies including: NoteMachine UK Ltd, ATM Services Ltd, NoteMachine Deutschland GmbH, NoteMachine Adria d.o.o, Eurochange Ltd, NM Mortgages Ltd and TestLink Services Ltd.
3. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. It is illegal, unethical and incompatible with modern business practices.
4. NoteMachine has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Our Business

5. The NoteMachine Group operates a variety of financial services products to the UK and Europe. Our portfolio includes an estate of Automated Teller Machines including parts repair and manufacture, a branch network of foreign currency bureaux and an online service, and a mortgage advisory service with a whole-of-market offering.

## Our High-Risk Areas

6. We monitor and assess our supply chain at the point of engagement and re-engagement to identify high risk areas where there is a greater chance of forced labour and, where high risk areas are identified, we take steps to mitigate the risk of modern slavery and human trafficking in these areas.
7. This assessment takes into consideration the mode and method of operation, the country or countries of operation and origin, the type and quality of product supplied, and the robustness of the engaged parties internal control policies, and other factors known to provide an indication of the risk of modern slavery within the supply chain.

## Our Policies

8. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include, but are not limited to:
  - 8.1. **Recruitment and Selection Policy:** We operate a robust recruitment policy, including conducting eligibility to work in the UK screening for all employees to safeguard against human trafficking or individuals being forced to work against their will.

- 8.2. **Whistleblowing Policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- 8.3. **Anti-Money Laundering Policy:** Money laundering has significant risk to our organisation and is often used to finance criminal activities. We have the appropriate responsible persons in place, and train all our staff on the risks of money laundering through our cash-based businesses.
- 8.4. **Code of Business Conduct:** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- 9. We review our policies at regular intervals to ensure that we remain compliant and pro-active in our approach to modern slavery.
- 10. We train our employees on the risks of human trafficking, forced labour, child labour and modern slavery and expect every employee to take responsibility for reporting any concerns that they have under this policy.

## Our Suppliers

- 11. Our Supplier Code of Conduct states that we will conduct our business, and expect our suppliers to conduct theirs, ethically and legally. We will reject suppliers who have criminal convictions arising from offences related to modern slavery. NoteMachine promise to;
  - 11.1. Pay our employees at least the national minimum wage / national living wage (as appropriate) in the UK and the prevailing minimum wage applicable within other countries of operation;
  - 11.2. Ensure that no part of our business operation or supply chain is in contravention of the Modern Slavery Act 2015;
  - 11.3. Take steps to eradicate modern slavery within our business and supply chain
  - 11.4. Hold our own suppliers to account over modern slavery;
  - 11.5. Terminate supplier contracts should any instances of modern slavery at our suppliers come to light.
- 12. In agreeing to do business with NoteMachine our suppliers must agree to implement these and other provisions in their own business.
- 13. We reserve the right to visit our suppliers without notice to audit their operations for evidence of forced labour, human trafficking or modern slavery. This right is regularly assessed using a risk-based approach, and audits are conducted where this assessment warrants it.

## Approval for this Statement

Approval for this statement is given by the CEO.



**Signed:** Peter McNamara, CEO and Founder

**Date:** 20<sup>th</sup> July 2020