

Modern Slavery & Human Trafficking Policy

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour 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.

Morson Group have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Scope

The policy covers all individuals employed by Morson Group as well as those engaged with the Group in the capacity of consultants, contractors, casual and agency staff (hereafter referred to as "colleagues"). It is colleague's responsibility to ensure that the contents of this policy are relayed to suppliers and other business partners to ensure compliance.

This policy does not form part of your Contract of Employment. We may vary this policy at any time.

Definitions

Human trafficking

Human trafficking is the process of arranging or facilitating the travel of another person with a view to exploitation. The offence can be committed even where the victim consents to travel; many victims believe they are being offered a better life. Exploitation could involve servitude, forced or compulsory labour, sexual exploitation, creation of indecent images or commercial dealings in bodily organs.

Modern Slavery

Modern slavery is the severe exploitation of people for personal or commercial gain, including forced labour, human trafficking, servitude, and slavery-like practices. It is a criminal offence and a violation of fundamental human rights. In the UK, modern slavery is defined and addressed under the Modern Slavery Act 2015, which places a duty on organisations to prevent and report such practices within their business and supply chains.

Forced or compulsory labour

Forced or compulsory labour means that someone is forced to do work that they have not agreed to voluntarily, under threat of punishment. The individual could be controlled by a gang, their direct employer or an agency for commercial gain. The individual may be in debt bondage. This is where a person is tied to their employer, working in poor conditions and for very little, or no pay, whilst they pay back an unreasonable or unattainable debt.

Our Commitments

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. Similarly, by implementing and enforcing effective systems and controls, we shall ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We shall ensure we provide freedom to colleagues to terminate employment, freedom of movement, no threats of violence, harassment and intimidation, debt bondage, bonded labour, obligation to work as a disciplinary measure and compulsory overtime.

If any worker working for the organisation is identified as a victim of modern slavery; they will be provided with access to remedy, compensation and justice.

We prohibit the use of worker paid recruitment fees.

Modern Slavery Act 2015

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery.

The Modern Slavery Act 2015 requires large businesses to produce and publish an annual statement setting out the steps taken to prevent modern slavery within their own business and supply chains.

Our Strategy

The aim of the strategy is to:

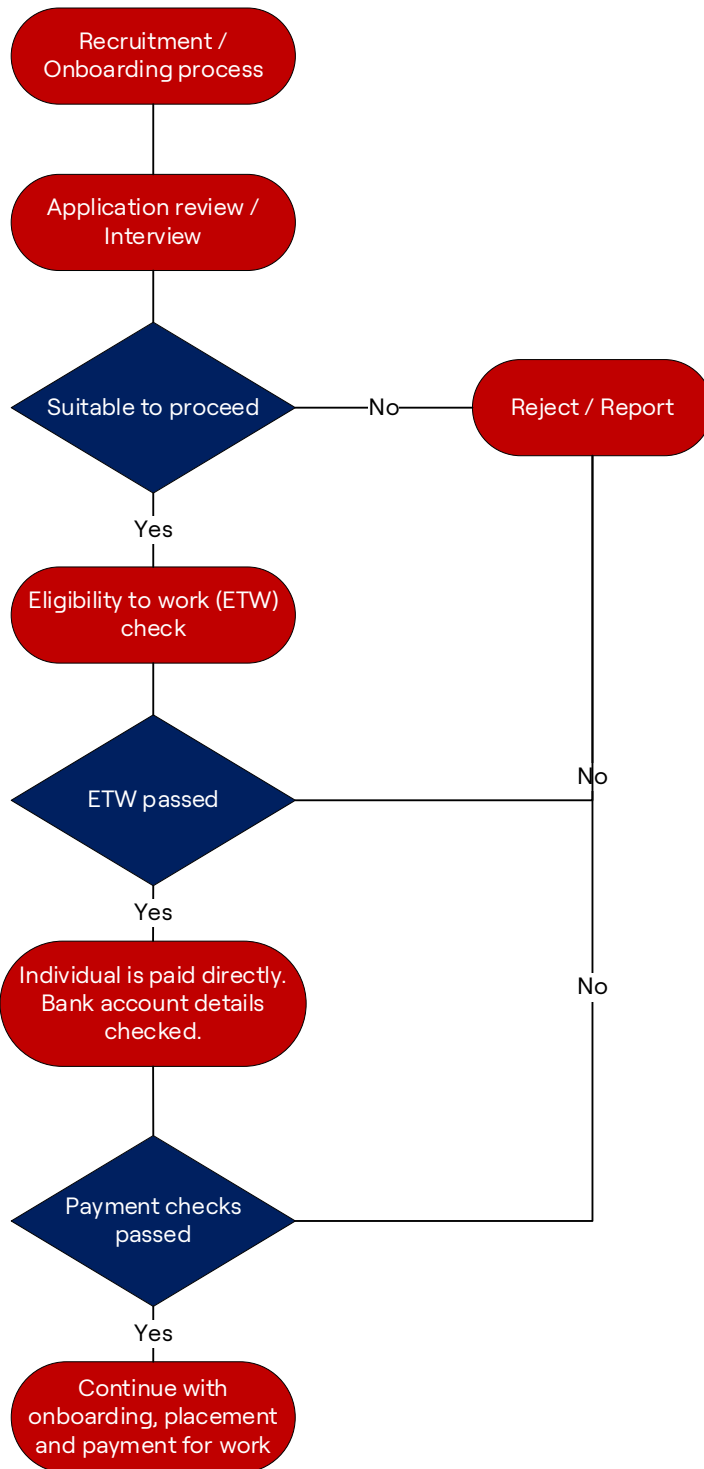
- Protect Morson colleagues from slavery and human trafficking.
- Comply with the Modern Slavery Act 2015; and
- Ensure our supply chain is compliant with the Modern Slavery Act 2015

The strategy builds on and adapts the framework that has been implemented in the UK Government. It has four components:

- Pursue – prosecuting and disrupting individuals and groups responsible for modern slavery.
- Prevent – preventing people from engaging in modern slavery, either as victims or offenders.
- Protect – strengthen safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness of and resilience against this crime.
- Prepare – reducing the harm caused by modern slavery through improved victim identification and enhanced support.

This content has been taken directly from the Modern Slavery strategy signed by the Home Secretary in November 2014. Morson has interpreted this strategy and introduced control methods in line with the Modern Slavery Act.

Managing Potential Risk



Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the HSQE Director or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

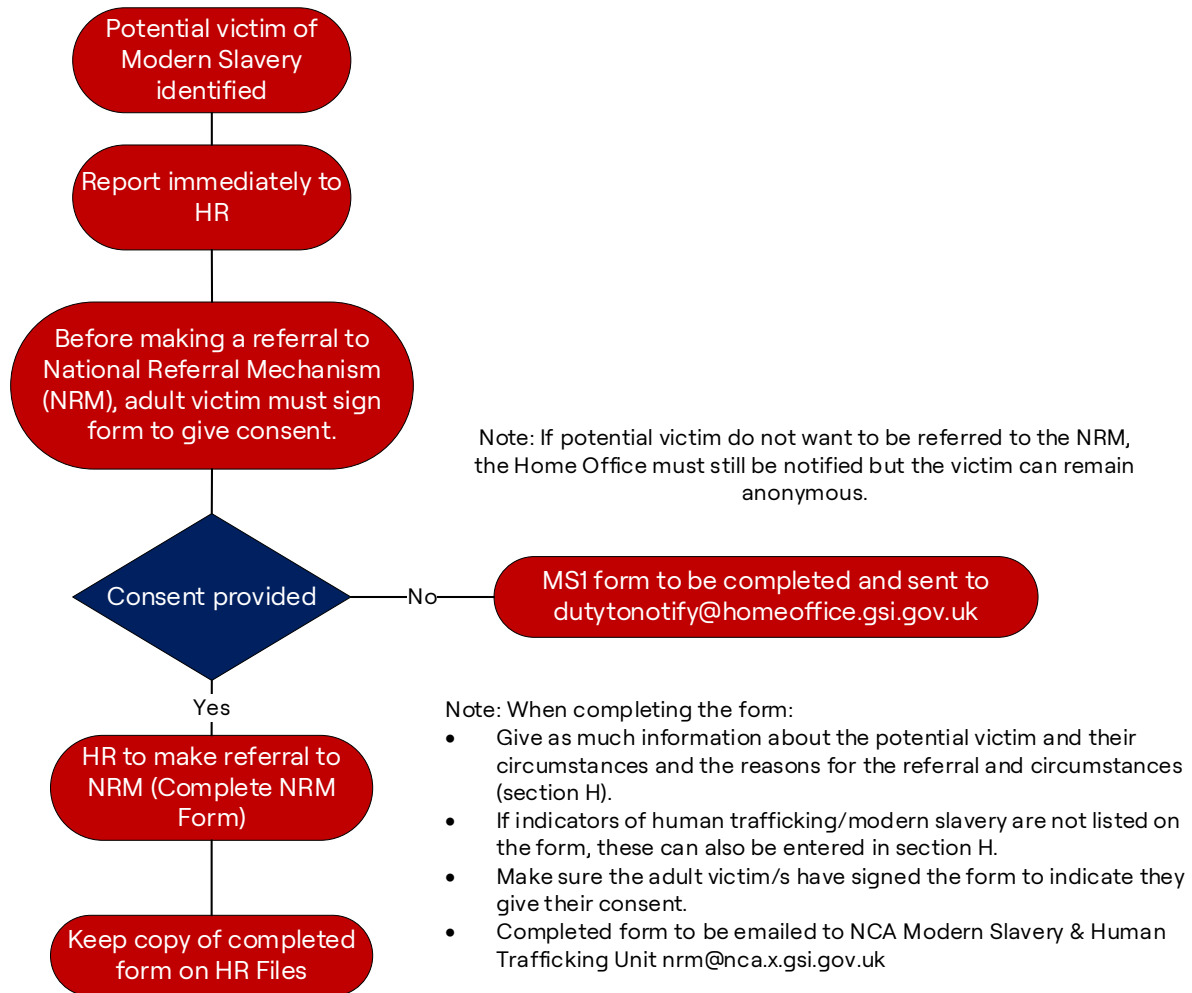
If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the HSQE Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the HSQE Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the intranet.

Escalation Process



Additional Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Recruitment and Selection Policy

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Ethics & Code of Conduct Policy

The purpose of this policy is to promote honest, ethical conduct from our staff, sub- contractors and suppliers and their activities which will maintain the trust of our colleagues and contractors.

Equity, Diversity & Inclusion Policy

The purpose is to ensure that no candidate or colleague receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex, sexual orientation, or part-time or fixed term contract status or is disadvantaged by conditions or requirements that cannot be shown to be justifiable.

Whistleblowing Policy

The purpose of this policy is to protect any colleague who makes a good faith disclosure under this policy is performing a valuable service to the company and will be protected from any detrimental actions for having done so.

Suppliers

Morson operates a Supplier Code of Conduct and conduct proportionate, risk-based checks in accordance with the Procurement, Supplier Qualification and Evaluation Procedure prior to approving any supplier and adding them to the Approved Supplier List.

This policy forms part of our relationship with all suppliers and they are required to confirm that no part of their business operations contradicts the Modern Slavery Act 2015.

In addition to the above, we require suppliers to confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery; and
- They pay their employees at least the national minimum wage / national living wage (as appropriate).

We may terminate the relationship at any time should any instances of modern slavery come to light.

Responsibilities

The Executive Directors and Group HR Director have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The HSQE Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HSQE Director or Group HR Director.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

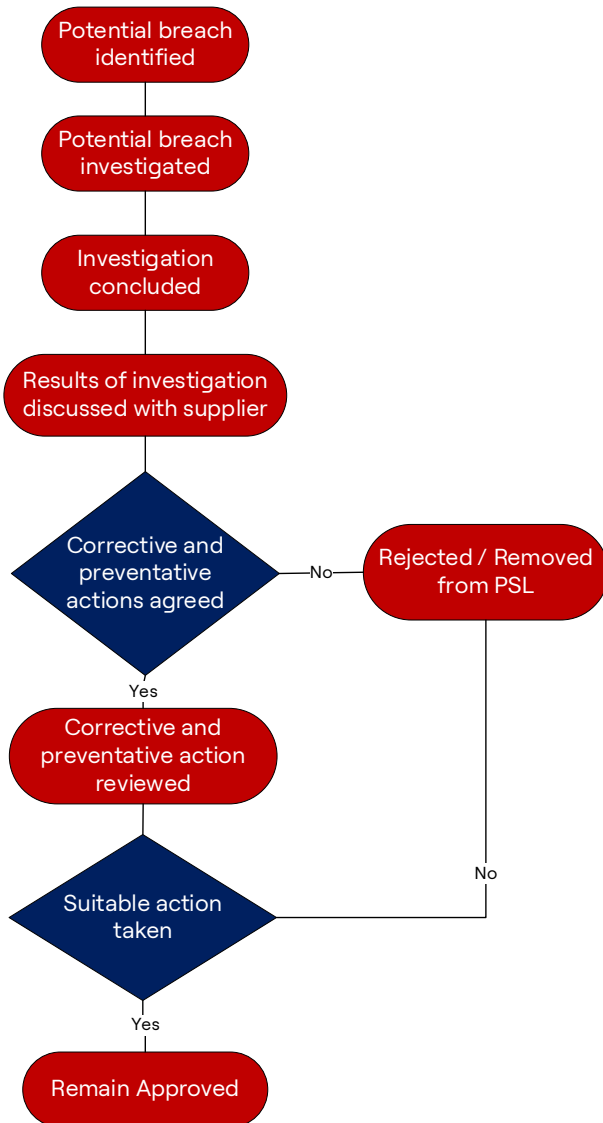
Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any colleagues who breach this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Our procedure for dealing with potential supplier breaches is outlined below.

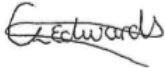
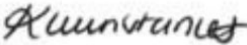




Amendment Record

Issue	Amendments	Date	Issued By
13	Policy Reviewed and rebranded. Grammatical amendments. Managing risk reformatted. Compliance manager changed to HSQE Director. Escalation process reformatted. Suppliers enhanced; reference to Product and Service Provision Procedure	September 2024	Natalie Smith / Katie Hancock

	added, contract changed to relationship, process flow removed. Supplier referenced to breaches of policy process flow. Flow chart reformatted. Refer to v.12 for old amendment record.		
14	Updated Modern Slavery definition to include the Modern Slavery Act 2015. Suppliers – added reference to the Procurement, Supplier Qualification and Evaluation Procedure and risk-based checks.	September 2025	Chloe Edwards Katie Hancock
15	Rebrand	December 2025	Katie Hancock

Document Control

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MG Approval	Gareth Morris		09/09/2025