



Morson Group

Modern Slavery & Human Trafficking Policy

MG | HR | POL | 016

Issue 11 – June 2021

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1. Document Control

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2. 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.

3. 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").

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

4. Definitions

4.1. 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.

4.2. Modern slavery

Modern slavery is the severe exploitation of other people for personal or commercial gain. Before it became impossible to own another person, the term 'slavery' referred to legally owning another person, as if they were a physical possession. Today, someone may behave as if they legally own a person, denying them their right to freedom this is still defined as slavery.

4.3. 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.

5. Our commitments

5.1.

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 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.

5.2.

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.

5.3.

We shall ensure we provide freedom of 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.

5.4.

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.

5.5.

We prohibit the use of worker paid recruitment fees.

6. 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 co-operative businesses to produce and publish an annual statement setting out the steps taken to prevent modern slavery within their own business and supply chains.

7. Our strategy

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators. This strategy sets out our comprehensive approach to tackling modern slavery and compliance to the strategy of the UK Government and its associated departments and agencies.

The aim of the strategy is to:

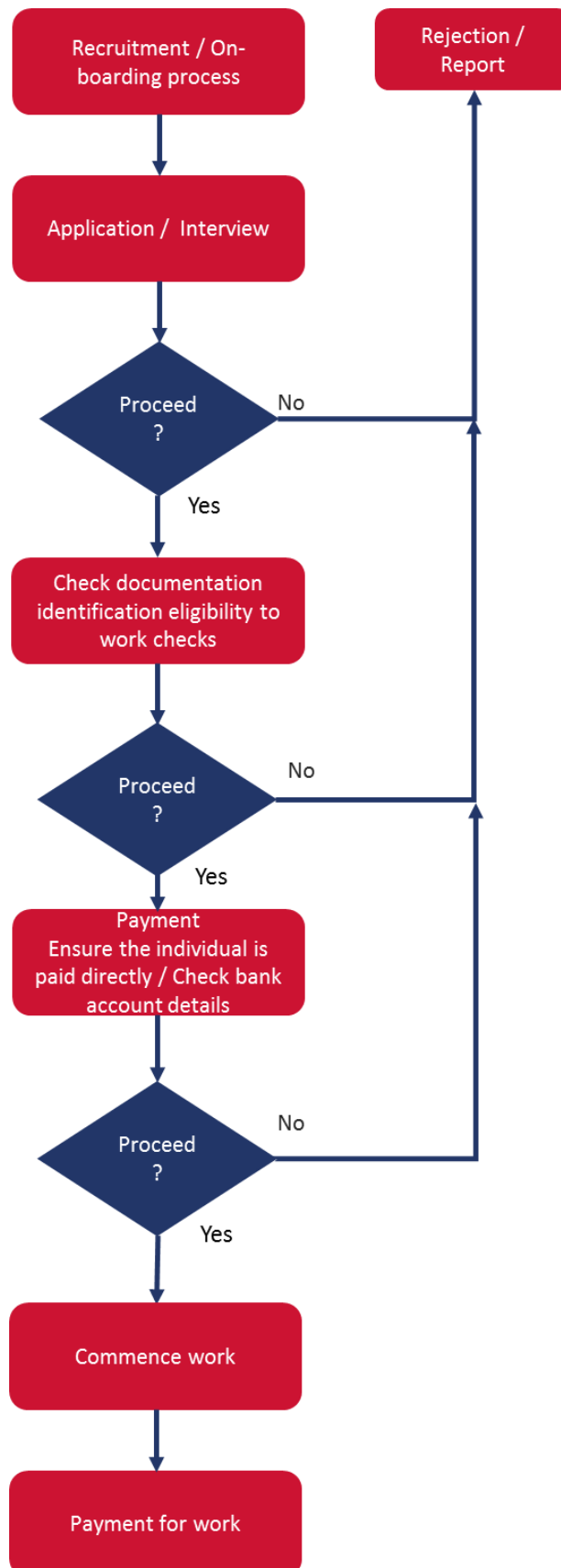
- Protect Morson colleagues from slavery and human trafficking;
- Comply with the Modern Slavery Act 2015; and
- Ensure our supply chain is in compliance with the Modern Slavery Act 2015

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 have interoperated this strategy and introduced control methods in line with the Modern Slavery Act.

7.1. Managing Potential Risk



7.2. 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 must notify your manager or the HSQE Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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.

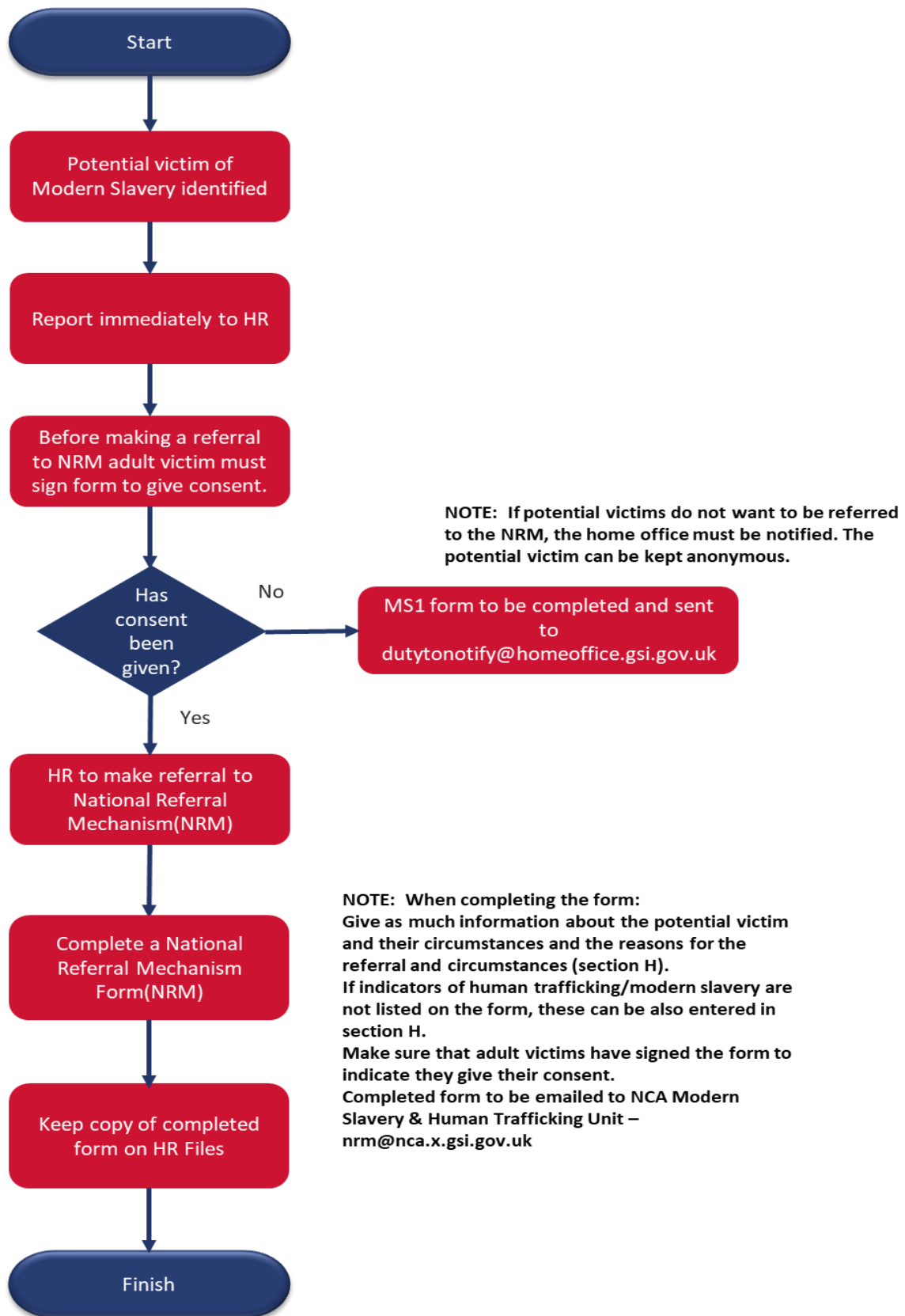
If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the HSQE Director.

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 compliance manager 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.

7.3. Escalation process



8. Additional policies

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

8.1. 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.

8.2. Ethics & Code of Conduct

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.

8.3. Equality, 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.

9. Suppliers

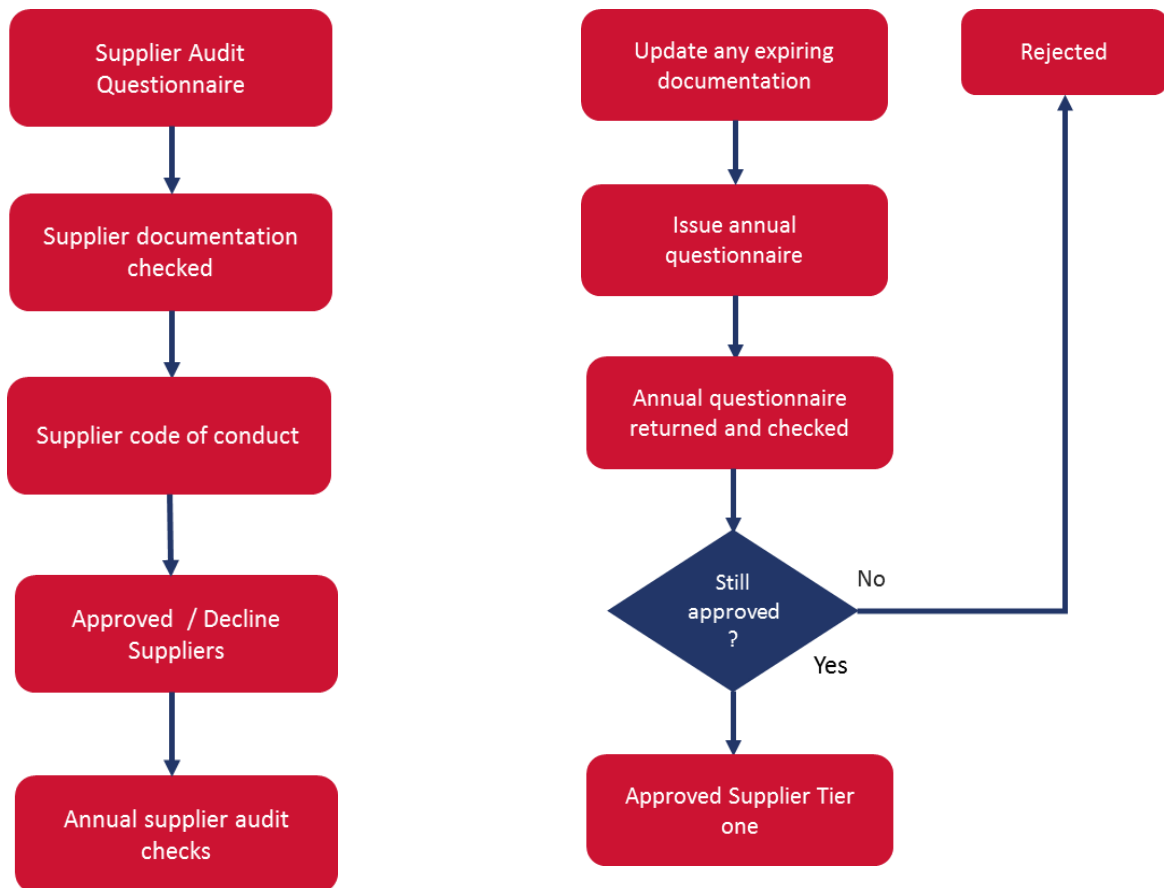
Morson operates a supplier code of contact and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

This policy forms part of our contract 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, as part of our contract with suppliers, we require that they 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 contract at any time should any instances of modern slavery come to light



10. Responsibilities

10.1.

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

10.2.

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.

10.3.

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.

10.4.

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 Head of HR.

10.5.

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.

10.6.

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.

11. Breaches of this policy

11.1.

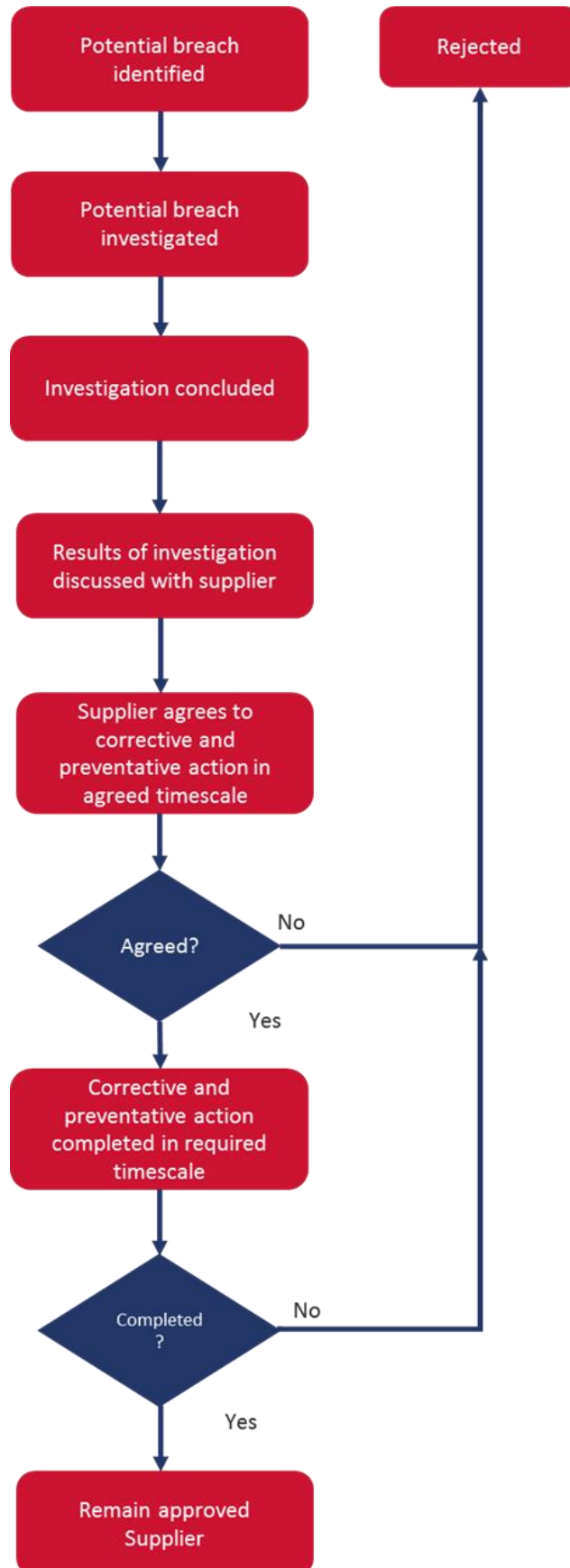
Any colleagues who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

11.2.

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

11.3.

Our procedure for dealing with potential breaches is outlined below.



12. Amendment Record

Issue	Issue Amendments	Date	Issued By
1	First issue	October 2009	HR
2	Amendment of form names and format	September 2010	HR
3	Re-branded	October 2013	HR
4	<p>Changed responsibility from HR Manager/ Campaign Manager and Interview Panel to Talent Acquisition Team</p> <p>3.1.1. Added requirement to log details of the Exit Interview onto Cascade.</p> <p>3.1.13. Added requirement to add vacancy details onto Cascade.</p> <p>3.1.7. Added ' external recruitment agencies may be used if other methods have been exhausted'</p> <p>3.1.11.Reference to the on line E.O. monitoring form.</p> <p>3.1.13. Removal of requirement to log all applications</p> <p>3.1.14. Removal of requirement to acknowledge all applications</p> <p>3.2.1. Added option for the Line Manager to be involved in the initial shortlisting.</p> <p>3.2.2. Removed the requirement to acknowledge applications</p> <p>3.2.3. Removed requirement to complete the Medical Form</p> <p>3.3.7. Removal of option to use the Candidate Questionnaire</p> <p>3.4.6. Added requirement to convert the vacancy on Cascade.</p> <p>3.5.1. Added requirement to refer all work experience enquiries to the HR Support Team</p> <p>3.5.2. Added requirement to send the student confirmation documents.</p>	July 2016	HR

	3.5.4. Added requirement to complete the Evaluation Form		
5	<p>Changed Checked by to Kirsty Wilson.</p> <p>2.1 Removed Executive Team.</p> <p>3.1.7 Added authorisation to be received by the Board.</p> <p>3.2.1 Removed 'After the closing date'</p> <p>3.2.2 Added whole section</p> <p>Renumbered 3.2.3 and 3.2.4</p> <p>3.4.6 Changed Cascade to HR system</p> <p>3.5.3 Added to be sent to HR department before close of business on the first working day.</p> <p>3.6.1 Added interview arranged with HR Department.</p>	October 2017	Kirsty Wilson
6	<p>2.1 – OPS changed for Exec</p> <p>2.3 – Talent team replaced HR</p> <p>2.6 – new addition</p> <p>3.1.1 – HRBP replaced HR department</p> <p>3.1.3 – Talent replaced HR</p> <p>3.3.6 – removed interview record</p> <p>3.5.1 – talent acq replaced HR</p> <p>3.5.6 – talent acq replaced HR</p>	August 2019	HR
7	Amended – Additional sections - 1 to 5	November 2019	HR
8	Strategy section now includes reference to the four P's	March 2020	HR
9	Rebranded – Morson International changed to Morson Talent	September 2020	Joshua Stodel
10	Reformatted	January 2021	Heather Deering
11	Rebrand Review	June 2021	Joshua Stodel