

Morvern Group Limited

# Anti-Slavery and Human Trafficking Policy

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## 1. Purpose

This Anti-Slavery and Human Trafficking Policy outlines Morvern Group Limited's commitment to preventing slavery and human trafficking in all its operations and supply chains. The policy aims to ensure compliance with the Modern Slavery Act 2015 and promote ethical business practices.

## 2. Scope

This policy applies to all employees, officers, directors, agents, consultants, contractors, and any other third-party representatives of Morvern Group Limited. It extends to all business dealings and transactions in every country in which we operate.

## 3. Policy Statement

Morvern Group Limited has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically, with integrity, and in compliance with all legal obligations. We will take proactive steps to ensure that slavery and human trafficking are not taking place in our business or supply chains.

## 4. Definitions

- **Modern Slavery:** Encompasses slavery, servitude, human trafficking, and forced or compulsory labour.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, force, coercion, abduction, fraud, deception, abuse of power, or vulnerability for the purpose of exploitation.

## 5. Commitments

- **Compliance with Laws:** Ensure compliance with the Modern Slavery Act 2015 and all other applicable laws and regulations.

## 6. Responsibilities

- **Board of Directors:** Overall responsibility for ensuring this policy complies with legal and ethical obligations and that all those under our control comply with it.
- **Management:** Ensure that relevant policies and procedures are implemented and followed. Conduct regular

risk assessments and audits.

- **Employees:** Adhere to this policy, report any concerns, and participate in training and awareness programs.

## 7. Due Diligence Processes

- **Risk Assessment:** Regularly assess potential risks related to modern slavery and human trafficking in our operations and supply chains.
- **Supplier Vetting:** Conduct due diligence on all new suppliers and regularly review existing suppliers to ensure compliance with our standards.
- **Audits and Monitoring:** Conduct appropriate audits of suppliers to ensure adherence to our anti-slavery policies. Use third-party auditors when necessary.

## 8. Training and Awareness

All applicable employees will receive training on modern slavery and human trafficking. Training will cover identifying signs of slavery, how to report concerns, and understanding the risks and responsibilities related to modern slavery.

## 9. Reporting and Compliance

- **Reporting Mechanism:** Employees and third parties can report concerns or suspicions regarding modern slavery through our confidential reporting system ([whistleblow@morverngroup.com](mailto:whistleblow@morverngroup.com)) to our Compliance Officer.
- **Investigation:** All reports will be investigated promptly and thoroughly by the Compliance Officer. Appropriate actions will be taken to address any issues identified.
- **Protection for Whistleblowers:** Individuals who report concerns in good faith will be protected from retaliation.

## 10. Monitoring and Review

The Compliance Officer will monitor the implementation of this policy and its effectiveness. The policy will be reviewed annually and updated as necessary to reflect any changes in the law or our operations.

## 11. Conclusion

Morvern Group Limited is committed to ensuring that modern slavery and human trafficking do not take place in any part of our business or supply chains. By adhering to this policy, we strive to maintain the highest standards of ethical conduct and integrity.

By order of the Board,  
**Jason Steen**

**Chairman of the Board**  
Morvern Group Limited