

## **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

This statement is made pursuant to S.54 of the Modern Slavery Act 2015 (“the MSA”) and sets out the steps taken by Moortown Group Limited and its subsidiary companies to prevent modern slavery and human trafficking in its (and their) business and supply chains.

Moortown’s policy is to conduct its business in an honest, open and ethical manner and to act professionally, fairly and with the utmost integrity in all our business dealings. Accordingly, Moortown aims to ensure that its supply chains ( including sub-contractors ) and every part of its business are, and remain, free from slavery and human trafficking.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

These as well as the suppliers of services make up the supply chain within Moortown Group Limited.

Moortown are committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities.

Moortown have taken steps to ensure that slavery and human trafficking are not taking place in the business (or in any supply chain).

We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

### *Policies relevant to slavery and human trafficking*

Moortown operates a number of internal policies with a view to ensuring that it is conducting business in an ethical and transparent manner.

In 2023/24 Moortown undertook a review of its policies and procedures in relation to how modern slavery and labour exploitation is addressed.

Relevant policies include:

**Corporate Social Responsibility Statement:** Through this statement, Moortown acknowledges that its operations will impact upon the economy, society and its employees and is committed to ensuring those effects maximise the positive impacts and minimise the negatives so that the business is run responsibly and in a sustainable manner.

**Code of Conduct:** The Code of Conduct makes clear the expectation placed on Moortown employees to maintain the highest standards of conduct and behaviour when representing the organisation; the Code also covering policies relating to the avoidance of conflicts of interest, impartiality, hospitality, political neutrality and whistleblowing.

**Statement of Ethics:** This clearly demonstrates Moortown’s pride in its reputation for acting fairly and ethically in doing business and the values, commitment and integrity of its employees; the statement also covers the policy relating to anti-bribery and corruption.

**Anti-Slavery and Human Trafficking Policy:** This policy specifically prohibits activities linked to slavery, servitude, forced labour and human trafficking and sets out exactly what is expected of Moortown’s staff and supply chain in order to prevent it.

Moortown adopts zero tolerance to corruption and bribery and this policy is endorsed by our Board. We fully support the government's objectives to eradicate modern slavery and human trafficking. Our annual statement will provide information to supplement this policy, including details of our activities and supply chains and actions we are taking to support government. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc ) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request. This policy statement will be reviewed annually and published.

Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

#### *Objectives for 2024/25*

The objectives for 2024/25 are set out below. These incorporate activities across Moortown and its operations. Moortown will:

- Ensure that Procurement Policy for suppliers of goods is followed
- Promote a Learning Pathway through the Supply Chain Sustainability School for Senior Management.
- Undertake an internal programme of awareness raising through our online portal.
- Develop and implement a communication plan in relation to labour exploitation.



Aiden McManus,  
Managing Director

6<sup>th</sup> January 2025