

## Morgans ANTI-SLAVERY & HUMAN TRAFFICKING

### **POLICY & STATEMENT**

**MOU-POL-11** 

Rev 3 – 28/3/2023

(reviewed 05/2/2025)

#### INTRODUCTION

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Morgan's of Usk, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year of 2022 and for the future.

#### **OUR BUSINESS AND SUPPLY CHAINS**

Currently our core business and supply chains include;

- Morgan's of Usk Ltd (Steel fabrication and erection UK eligible workers)
- Skilled / semi-skilled Agency workforce (steel fabrication UK eligible workforce)
- Sub-contract labour (Steel erection)
- Supply of raw materials and products (predominantly UK sourced)

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

The company can confirm that to date we have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

#### **RISK ASSESSMENT**

The company conducts an annual risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

#### **POLICIES**

Morgan's of Usk Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

 Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.



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Code of Conduct - our code encourages employees to do the right thing by clearly stating
the actions and behaviour expected of them when representing the business. We strive to
maintain the highest standards of employee conduct and ethical behaviour when operating
abroad and managing our supply chain.

 Purchasing Code - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

#### SUPPLIER DUE DILIGENCE

Morgan's of Usk conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services (e.g. labour suppliers)
- Auditing the suppliers and their health and safety standards, anti-slavery accreditation (where relevant), labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- Their employees can demonstrate a legal right or authorisation to work within the UK
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

#### **AWARENESS**

Morgan's of Usk has raised awareness of modern slavery issues by putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

This is pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the companies slavery and human trafficking statement for the present financial year.

Signed . A May Date: 28/03/2023 (Reviewed 05/02/2025)

**Andrew Morgan - Managing Director**