

# MORRIS & COMPANY

## MORRIS GROUP

### ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This policy has been adopted by:



Morris & Company (Shrewsbury) Limited (Company number 5041054);  
Morris & Company Limited (Company number 0185693);



Morris Property Limited (Company number 3033776);



Marrington Escapes Limited (Company number 06796208)

and all other subsidiaries of Morris & Company (Shrewsbury) Limited (Company number 5041054) from time and time together referred to as the Morris Group.

#### 1. POLICY STATEMENT

- 1.1 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. The Morris Group has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and to implementing and enforcing effective systems to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 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 standards from all of our contractors, suppliers and other business associates. As part of our contracting processes, we will 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 standards.
- 1.3 Under section 54 of the Modern Slavery Act 2015 organisations that provide goods and services in the UK with a total global turnover of £36 million or more are required to produce a slavery and human trafficking statement each financial year.

#### 2. SCOPE

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 3. DEFINITIONS

- 3.1 **“Slavery”** is in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.
- 3.2 **“Human Trafficking”** is an offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.
- 3.3 **“Turnover”** means the amount derived from the provision of goods and services falling within the ordinary activities of the commercial organisation or subsidiary undertaking, after deduction of
- a) Trade discounts.
  - b) Value added tax.
  - c) Any other taxes based on the amounts so derived (HM Government - 'Transparency in Supply Chains')

### 4. RESPONSIBILITY FOR THE POLICY

- 4.1 The Board of Directors of Morris & Company (Shrewsbury) Limited has overall responsibility for ensuring this policy complies with all legal and ethical obligations, and that all those under our control comply with it.
- 4.2 The compliance manager of each company within the Morris Group 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 procedures to ensure we are effective in countering modern slavery.
- 4.3 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.
- 4.4 Comments, suggestions and queries with regard to this policy are encouraged and should be addressed to the compliance manager of the relevant Morris Group company.
- 4.5 We will comply with our legal obligations under the General Data Protection Regulations, for the time being in force, in the course of processing any data under this policy. A link to our Privacy Policy is below, or can be obtained by request to your Manager or Human Resources.

### 5. COMPLIANCE WITH THE POLICY

- 5.1 You must ensure that you read, understand and comply with this policy.
- 5.2 Slavery and human trafficking is classed as abuse, and indicators could be:
- Signs of physical or emotional abuse
  - Appearing to be malnourished, unkempt or withdrawn
  - Isolation from the community, seeming under the control or influence of others
  - Living in dirty, cramped or overcrowded accommodation, or living and working at the same address
  - Lack of personal effects or identification documents
  - Always wearing the same clothes
  - Avoidance of eye contact, appearing frightened or hesitant to talk to strangers

- Fear of law enforcers

- 5.3 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. Our due diligence across the Company includes our agency workers and sub-contractors.
- 5.4 You must notify your immediate line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. If you have any concerns in reporting to your immediate line manager you should submit your concerns in writing to the CEO of the Morris Group company which is your employer or to the Morris Group Company Secretary.
- 5.5 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.
- 5.6 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify one of the individuals referred to in paragraph 5.4 above or report it in accordance with our Whistleblowing Policy as soon as possible.
- 5.7 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 any one of the individuals referred to in paragraph 5.4 above.
- 5.8 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 in the Company handbook and on the Company Intranet.

## **6. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 6.1 Training and/or information on this policy will be provided for all staff, appropriate to their role and responsibility, via induction and regular training as necessary.
- 6.2 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.

## **7. RELATED POLICIES**

- 7.1 We have a number of existing policies which assist the organisation in assessing and mitigating the risk of modern slavery in the Morris and Company. Including:
- Recruitment Policy
  - Corporate Social Responsibility
  - Disciplinary Policy
  - Grievance Policy
  - Whistleblowing Policy

**8. BREACHES OF THIS POLICY**

8.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal on the grounds of gross misconduct.

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

Signed:

Lyndsey O'Loughlin  
Lyndsey.O'Loughlin@Morris.2024.16.001.GNT711

On behalf of the Morris Group

Date:

Apr 16, 2024  
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