

LABOUR STANDARDS POLICY

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Moorfields acknowledges its obligations towards its employees, stakeholders and the communities in which it works, and has outlined below its policy in relation to labour standards. This policy is relevant to the Moorfields itself, our contractors, sub-contractors, suppliers, freelancers, members of the public and other parties engaged with the Moorfields business.

MINIMUM LABOUR STANDARDS

The Company has identified the following compelling reasons to establish a comprehensive system of minimum labour standards to guide its business operations:

1. **Ethical Responsibilities** – Moorfields acknowledges its obligations towards its employees, stakeholders and the communities in which we work and operate. Moorfields wishes to carry out work and to do business in an ethical fashion.
2. **Adverse Publicity and Damage to the Moorfields's Reputation** – adverse publicity from the discovery of poor labour standards within the Moorfields's business operations presents reputational and structural risks to Moorfields not only in terms of revenue, but also in respect of staff recruitment and retention. Poor labour standards can also lead to a loss of trust and confidence with suppliers and also within the wider community. The Company therefore wants to do what is right and be seen to do what is right.
3. **Reduced Quality of Service** – Moorfields recognises that there is commonly a link between poor labour standards and poor quality of services. To this end, it is in the interest of Moorfields to ensure that Moorfields reaches and exceeds minimum labour standards requirements at all times.

To help identify a defined set of minimum labour standards, Moorfields has referred to the following resources:

1. Social Accountability International's SA8000 document;
2. The UN's Universal Declaration of Human Rights; European Convention Human Rights;
3. Human Rights Act 1998

These minimum labour standards are:

1. **Child Labour** – Moorfields does not and will not engage in or support the use of child labour. If Moorfields engages any young workers (e.g. on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day. The Company respects and supports children's rights consistent with the United Nations Convention on the Rights of the Child (CRC) and the Children's Rights and Business Principles (CRBP).
2. **Forced or Compulsory Labour** – Moorfields shall not engage in or support the use of forced, bonded or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment. We will not tolerate the exploitation of vulnerable persons or the trafficking of persons with the intent of them being subsequently exploited.
3. **Health and Safety** – the Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injuries to employee's health by minimising, so far as is reasonably practicable, and in cooperation with its employees, workers and other members of staff, the causes

of hazards inherent in the workplace. All employees will receive safety and job specific health and safety instructions during the course of their employment with the Company. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing the Health and Safety element of this policy is assigned to Moorfields HR Manager. (Please refer to Moorfields Health and Safety Policy).

4. **Freedom of Association** – freedom of association is respected and the Company will comply with UK and the Republic of Ireland labour relations legislation (as appropriate) in this regard.
5. **Discrimination** – Moorfields shall not engage in or support any discriminatory practices in recruitment, remuneration, access to training, promotion, termination or retirement based on gender (including gender reassignment), marital status, family status, religious belief, disability, age, racial grounds (race, colour, nationality or ethnic origin, including membership of the traveller community), sexual orientation or other conditions that could give rise to discrimination. Moorfields has in place an Equal Opportunities Policy which is provided to all new employees at induction.
6. **Disciplinary Practices** – Moorfields shall treat all employees and members of staff with dignity and respect. The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment, intimidation or verbal abuse of personnel. No harsh or inhumane treatment is allowed and the Company shall ensure that no disciplinary procedure is operated except as per the Company's Disciplinary Policies.
7. **Working Hours** – Moorfields shall comply with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 12 hours per week, with the relevant periods of rest similarly observed. The Company ensures that all employees have the legal right to be employed in the UK or the Republic of Ireland (as appropriate).
8. **Remuneration** - Moorfields shall comply with national laws and regulations with regard to wages and benefits. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. All members of staff are remunerated in a way which is in excess of the national minimum wage in the UK or the Republic of Ireland as is appropriate. The Group is committed to the Living Wage for staff other than those on formalised training programmes.

Moorfields also commits to:

- Compliance with relevant legal and other requirements to which the Company subscribes
- Ensuring that all our key contractors, sub-contractors and suppliers are aware of this policy; and Making available sufficient resources for the implementation of this policy
- Holding annual training sessions for all staff on Labour Standards and demonstrating that any involvement in human trafficking practices are specifically forbidden and any involvement will involve disciplinary procedures

Sarah Colledge, Compliance Senior Manager will carry out quarterly internal audits to ensure this policy is being adhered to.