



MODERN DAY SLAVERY

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Date	Version	Created by	Description of Change
1.1.2024	1.0	Marketing Manager	Version control added
06.06.2024	2.0	Human Resources Administrator	Incorporates the law on Child Labour

Our Commitment

Modern slavery is a serious crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced labour, and human trafficking, all of which involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We are dedicated to

implementing and enforcing effective systems and controls to ensure that modern slavery is not occurring anywhere in our business or supply chains.

Transparency and Expectations

We are committed to maintaining transparency in our efforts to combat modern slavery in our business operations and supply chains, in line with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We also expect our suppliers to hold their own suppliers to the same high standards.

Scope

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. It does not form part of any employee's contract of employment and may be amended at any time.

Responsibilities

The Director of Compliance has overall responsibility for ensuring that this policy complies with our legal and ethical obligations and that all those under our control comply with it. The Director of Compliance is also responsible for the day-to-day implementation of this policy, monitoring its use and effectiveness, addressing any queries about it, and auditing internal control systems and procedures to ensure they effectively counter modern slavery. Management at all levels is responsible for ensuring that their teams understand and comply with this policy and receive adequate and regular training on the issue of modern slavery in supply chains.

Compliance

All employees must read, understand, and comply with this policy. Preventing, detecting, and reporting modern slavery in any part of our business or supply chains is the responsibility of everyone working for us or under our control. Employees are required to avoid any activity that might lead to or suggest a breach of this policy. They must notify the Director of Compliance as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains at the earliest possible stage. If they believe or suspect that a breach of this policy has occurred or may occur, they must notify their manager and/or the Director of Compliance or report it in accordance with our Whistleblowing Policy as soon as possible. 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 that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered such treatment, they should

inform the Director of Compliance immediately. If the matter is not remedied, and they are an employee, they should raise it formally using our Grievance Procedure.

Communication and Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Minimum Labour Standards

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

We recognise several compelling reasons to establish comprehensive minimum labour standards to guide our business operations. Ethically, we acknowledge our obligations towards our employees, stakeholders, and the communities in which we operate, striving to conduct business in an ethical manner. We understand that adverse publicity from poor labour standards can harm our reputation, affecting revenue, staff recruitment, and retention, and eroding trust with suppliers and the wider community. Additionally, there is often a link between poor labour standards and reduced service quality, so it is in our interest to meet and exceed minimum labour standards at all times.

To define these standards, Moorfields has referred to resources such as Social Accountability International's SA8000 document, the UN's Universal Declaration of Human Rights, the European Convention on Human Rights, and the Human Rights Act 1998.

Key Labor Standards

Child Labour: We do not and will not engage in or support the use of child labour. If we engage any young workers (e.g., for work experience), we will ensure a suitable risk assessment is carried out, and young persons are not exposed to hazardous conditions or work more than 8 hours per day. We respect and support 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).

Forced or Compulsory Labour: We shall not engage in or support the use of forced, bonded, or compulsory labour, including bonded or involuntary prison labour. Employees are free to

leave after providing reasonable notice as per their contracts. We will not tolerate the exploitation of vulnerable persons or the trafficking of persons with the intent of exploitation.

Health and Safety: We provide a safe and healthy workplace environment and take effective steps to prevent potential accidents and injuries by minimizing hazards in the workplace. All employees will receive safety and job-specific health and safety instructions during their employment. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing health and safety measures is assigned to HR.

Freedom of Association: We respect the right to freedom of association and comply with UK and Republic of Ireland labour relations legislation.

Discrimination: We do not engage in or support 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. We have an Equality, Diversity, Inclusion and Belonging Policy provided to all new employees at induction.

Disciplinary Practices: We treat all employees and staff with dignity and respect and do not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment, intimidation, or verbal abuse. No harsh or inhumane treatment is allowed, and disciplinary procedures are operated per the Company's policies.

Working Hours: We comply with applicable laws and industry standards on working hours and holiday entitlements. Our normal working hours do not exceed 48 hours per week, and overtime does not exceed 12 hours per week, with relevant rest periods observed. We ensure all employees have the legal right to be employed in the UK or the Republic of Ireland.

Remuneration: We comply with national laws and regulations regarding wages and benefits. All work-related activities are based on recognised employment relationships established according to national law and practice. We ensure all employees are paid above the national minimum wage and are committed to the Living Wage for staff, except those on formal training programs.

Implementation and Monitoring

We are committed to compliance with relevant legal and other requirements and ensure that all key contractors, sub-contractors, and suppliers are aware of this policy. We provide sufficient resources for the implementation of this policy and hold annual training sessions for all staff on labour standards, emphasising that any involvement in human trafficking practices is strictly forbidden and will result in disciplinary action.

The Director of Compliance will conduct quarterly internal audits to ensure adherence to this policy.

Review

This policy will be reviewed annually and will be reviewed on the basis of feedback, best practice, changes in legislation or regulatory standards.

Last review date: June 2024