

1<sup>st</sup> January 2024

## Modern Slavery & Human Trafficking Statement

### Policy Statement

Morgenrot commits to developing and adopting a proactive approach to tackling modern slavery in business and supply chains. The Company acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

### Coverage

This policy applies to Morgenrot Group PLC, its Group Companies, and all its suppliers of goods and services.

### Organisational Structure and Supply Chains

Morgenrot is a family of people who believe that business should operate around a set of values and principles. All our suppliers are subject to our Supplier Approval Procedure and are required to complete a Supplier Approval Questionnaire, which assesses, amongst other things, their ethical trading standards.

### Responsibility

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking are not taking place within the organisation or its supply chains.

### Policy Commitments

Morgenrot shall:

- Designate appropriate managers within the business to have responsibility for developing and operating company procedures relevant to this issue.
- Operate a due diligence process with respect to slavery and human trafficking for choosing our suppliers, as appropriate to our supply chain.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work-finding fee.
- Ensure that all staff responsible for directly recruiting workers are aware of issues around third-party labour exploitation and signs to look for.
- Ensure that labour sourcing, recruitment, and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters and Labour Abuse Authority and the police.
- Provide information on tackling "Hidden Labour Exploitation" to our workforce through workplace posters and our Company intranet. A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to employees electronically and can be obtained from the People department upon request.
- Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so, and investigate and act on reports appropriately.
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.
- Ensure that all our staff are aware of the need to audit any supply partner for their commitments to tackle modern slavery and adhere to moral principles.

In conclusion, our Modern Slavery & Human Trafficking Statement is more than a declaration of our ethical stance—it is a commitment to action and continuous improvement. By implementing the policies and procedures outlined in this document, we pledge to diligently work towards eradicating modern slavery and human trafficking from our business operations and supply chain. This document serves as a foundation for our ongoing efforts to ensure that our business practices are ethical, transparent, and aligned with our core values of integrity and responsibility.

We recognise that the fight against modern slavery is a shared responsibility and thus commits to collaborating with our employees, suppliers, and the wider community to foster an environment where human rights are respected and protected. We are dedicated to reviewing and enhancing our policies regularly, responding proactively to new challenges, and maintaining an open dialogue with all stakeholders to ensure that our business remains a force for good in the global fight against modern slavery and human trafficking.

Carl Plath



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