

Modern Slavery and Human Trafficking Policy

Financial year: 5 April 2025 – valid for 1 year

Publication date: 12th January 2026

1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Morganstone Ltd has taken during the financial year ended 5 April 2025 to prevent modern slavery and human trafficking within its business operations and supply chains. In addition, Morganstone have updated this policy to allow for additional measures as outlines in the Home Office's updated Transparency in Supply Chain guidance.

Morganstone Ltd is committed to acting ethically and with integrity in all its business relationships and to implementing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within the organisation or its supply chains.

Morganstone is committed to ensuring that modern slavery and human trafficking have no place in our business or our supply chains. We operate a zero-tolerance approach to all forms of exploitation, including forced labour, debt bondage, and human trafficking.

2. Our Business and Structure

Morganstone Ltd is a UK-based construction and development company operating primarily across South Wales. The company delivers a range of construction services including residential, commercial, education, healthcare and public-sector projects.

The company engages directly with clients and operates as a Principal Contractor, utilising a supply chain of subcontractors, consultants and suppliers to deliver specialist works and services.

3. Our Supply Chain

Morganstone Ltd's supply chains include:

- Construction subcontractors and trade contractors
- Materials and product suppliers
- Plant and equipment hire providers
- Professional consultants and service providers

The majority of suppliers are UK-based and operate within regulated industries. Where overseas supply chains are involved (e.g. materials manufacturing), Morganstone Ltd takes steps to ensure appropriate assurances are in place. Our definition of 'supply chain' extends beyond the production of goods to include our secondary value chain. This includes all outsourced services such as cleaning, security, catering, and waste management, as well as the 'labour supply chain' (recruiters and transit agents) involved in providing personnel to our sites.

4. Policies in Relation to Modern Slavery

Morganstone Ltd has the following policies and procedures in place to address modern slavery risks:

- Modern Slavery Policy
- Ethical procurement and supplier approval procedures
- Recruitment and employment controls
- Whistleblowing and reporting procedures

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These policies reflect our commitment to transparency, ethical conduct and compliance with applicable legislation.

We strictly adhere to the 'Employer Pays Principle.' No worker shall pay for a job; the costs of recruitment shall be borne by the employer. We prohibit our suppliers and any labor intermediaries from charging recruitment fees or related costs to workers. Any breach of this will require the supplier to reimburse the affected workers in full. Workers must retain control of their original identification documents (e.g., passports, identity cards, or work permits). We prohibit the withholding or 'safekeeping' of these documents by any employer or labour agent. All workers shall have the freedom to terminate their employment upon reasonable notice without penalty or fear of physical or financial reprisal.

5. Due Diligence Process

Morganstone Ltd undertakes proportionate due diligence across its supply chain, including:

- Use of an approved supplier database
- Pre-appointment assessments of subcontractors and suppliers
- Contractual requirements relating to compliance with labour laws and ethical standards
- Ongoing monitoring of supplier performance and compliance

Where appropriate, suppliers may be required to confirm their own modern slavery policies and procedures.

6. Due Diligence Process

The company recognises that certain areas of the construction industry may present an increased risk of modern slavery, particularly where:

- Labour-intensive activities are involved
- Temporary or agency labour is used
- Overseas supply chains exist

Morganstone Ltd manages these risks through:

- Robust recruitment and right-to-work checks
- Verification of identity and payment arrangements
- Monitoring of labour practices on site
- Supply chain audits where appropriate

We recognise that our internal purchasing practices including aggressive pricing, short lead times, and late changes to orders can increase the risk of modern slavery in our supply chain. We commit to ensuring our procurement teams are trained to identify these 'unintended consequences' and to foster stable, long-term relationships with suppliers that allow for fair wages and safe working hours.

7. Effectiveness and Monitoring

Morganstone Ltd monitors the effectiveness of its approach through:

- Supplier compliance checks
- Internal audits and reviews
- Management oversight of procurement and site operations
- Investigation of any reported concerns or incidents

Any identified issues are addressed promptly and escalated where necessary.

8. Training and Awareness

Morganstone Ltd is committed to raising awareness of modern slavery and human trafficking. Training and awareness measures include:

- Management briefings on ethical procurement and labour practices
- Employee awareness initiatives on identifying and reporting concerns
- Induction processes for new employees and managers
- Yearly training on Modern Slavery for all staff by an approved provider

Training requirements will continue to be reviewed and enhanced as part of ongoing business improvement.

9. Reporting and Whistleblowing

Morganstone Ltd operates an open and transparent reporting culture. Employees and supply chain partners are encouraged to report any concerns relating to modern slavery or unethical practices through established management and reporting channels.

All reports are taken seriously and investigated appropriately. 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.


10. Scope and Responsibility

Morganstone ensures that everyone is aware of this policy, and who is responsible for enforcing it:

- 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, and third-party representatives.
- The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems.

11. Approval and Review

This statement was approved by the Board of Directors of Morganstone Ltd and is signed on its behalf. This statement will be reviewed and updated annually in accordance with the Modern Slavery Act 2015.



Andrew Pettigrew
Managing Director
Morganstone Ltd
12th January 2026

Next Review Date: 12th January 2027