

Moralis Group Limited, and associated and subsidiary companies.

## Modern Slavery Act Policy (2020/2021)

### Introduction

This statement sets out our actions to understand all potential modern slavery risks related to our businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and its supply chains. This statement relates to actions and activities during 2020 and 2021 and is published within six-months of our financial year end which is the last week of March each year.

As part of the logistics sector we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in all our activities, and to ensuring that our supply chains are, and remain, free from slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of Moralis Group Ltd. which include property management and investment (William Thompson Homes); self-storage (GBN Self Storage); logistics (GBN Logistics); and waste management (GBN Services). Our supply chains are generally short and limited to large companies who supply large items of equipment and heavy goods vehicles. We have a supply chain for casual / temporary staff at some sites.

### Countries of operation and supply

Primarily we operate in the UK, however, our logistics arm reaches into Europe and beyond for the transportation of goods.

The following is the process by which the company assesses whether or not particular activities abroad or countries are high risk in relation to slavery or human trafficking:

- Consult the government website at <https://www.gov.uk/government/collections/overseas-business-risk>
- Taking account of the government advice and considering the nature of the works to be undertaken, and the load to be transported a view is taken on the likelihood of human trafficking affecting the journey.
- For journeys considered to be high risk the driver(s) is advised of the risk and the controls to be taken to keep both the driver and the load safe. The driver is also supplied with details of local law enforcement services to contact if they suspect slavery or human trafficking is occurring.

### High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Logistics journeys to Africa and the Middle East, as the government identifies these as high risk countries for Human Rights issues; Bribery and Corruption concerns; and Organised Crime.
- Using enclosed lorry trailers and transporting shipping containers as these are frequently targeted for human trafficking.

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### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policy:** company directors are responsible for developing this policy, publishing it, reviewing it annually and ensuring all relevant staff comply with the policy.
- **Risk assessments:** operational managers are expected to consider the implications for human rights and modern slavery whenever they assign work. If they perceive the risk to be high then a formal written assessment of the risk is produced and this must include actions to reduce the risk to the lowest level reasonably practicable.
- **Investigations/due diligence:** at any time that it is known or discovered that slavery and/or human trafficking has occurred a senior manager will be appointed to thoroughly investigate the circumstances. The senior manager will identify immediate causes, underlying causes and root causes for the occurrence, and identify what can reasonably be done by Moralis Group Ltd. and its associated and subsidiary companies.
- **Training:** managers and all staff will be briefed on an annual basis concerning slavery and human trafficking and their role in reporting and preventing it. For 2020 the Covid-19 pandemic means that face-to-face briefings are unlikely so we are mandating posters to be placed around worksites to raise awareness, and those staff with desktop or laptop computers are being required to view a YouTube video released by the GLAA.

### Relevant policies

The organisation operates the following policy that describes its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The organisation encourages all its workers to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns should follow the process described in their Employee Handbook.

### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. We will take steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.

Moralis Group Ltd. and associated and subsidiary companies will invoke sanctions against any supplier that fails to improve their performance in line with an action plan, up to and including the termination of the business relationship.

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### Performance indicators

Moralis Group Limited and associated and subsidiary companies:

- require all managers to have read this policy by the end of 2020, and all new managers to have read this policy within one year of appointment.
- require all managers with staff (including agency and temporary staff) to display the appended posters on notice boards, messroom and other areas frequented by staff.
- require all Site Managers annually, to obtain from their suppliers, the supplier's statement on their position on modern slavery and human trafficking.

### Training and Awareness Raising

Due to the difficulties imposed by Covid-19 in gathering people for briefings, the Moralis Group Ltd. requires all managers to ensure that at least two different appended posters are placed in areas that are frequented by staff. On the posters the local contact should be the most senior manager available locally.

Also, that all staff with day-to-day internet access via desktop or laptop computers watch the Gangmasters and Labour Abuse Authority video GLAA Modern Slavery and to record that the video has been watched. The video is available at <https://www.youtube.com/watch?v=d9tN6FM28ws>

### Chairman's approval

This policy has been approved by the Chairman of the Board of Directors.

The financial year end is at the end of March each year. An updated statement will be published by the end of May 2021.

Signature – Signed on Original by - David Thompson - 7<sup>th</sup> May 2020

Appended:

- A Gangmasters Victims Poster
- B Forced Labour (English, Polish, Lithuanian, and Russian)
- C Forced Labour (Slovakian, Bulgarian, Latvian, and Romanian)
- D Stronger Together

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Appendix A – Gangmasters Victims Poster



Gangmasters &  
Labour Abuse Authority



**Victim of labour exploitation or modern slavery?**

**Want to speak out but not sure what will happen next?  
The Gangmasters and Labour Abuse Authority can help**

### What happens next?

- We will want to meet to discuss your situation. This conversation could also include other agencies
- You will be offered a medical check-up and given help if necessary
- Interpreters can be provided if necessary
- Food and clothing can be provided if needed and you may be taken to a secure, safe place
- We will listen to your story and decide if you are a victim of labour exploitation
- You will be given a period of time (45 days) to recover from your ordeal and decide on next steps
- You will be protected from those who did this to you
- You may be given assistance to return to your home country if you wish
- Ongoing help and support will be made available
- Access to wider support from a range of agencies can be made available

**Don't be afraid, we are here to help you**

**Call 0800 432 0804 in confidence, confide in your manager or visit [www.gla.gov.uk](http://www.gla.gov.uk)**

*Working in partnership to protect vulnerable and exploited workers*

## IF YOU EXPERIENCE MORE THAN ONE OF THESE CONDITIONS YOU MAY BE A VICTIM OF FORCED LABOUR.



### Are you being forced to work when you don't want to?

Czy jesteś zmuszany/ zmuszana do pracy wtedy, kiedy tego nie chcesz?

Ar jus verčia dirbti per prievartą?

Вы вынуждены работать, когда вы не хотите?( противвашего хотения)



### Do you have to pay someone money to give you work?

Czy musisz płacić komuś w zamian za otrzymanie pracy?

Ar privalote duoti kam nors pinigų, kad parūpintų jums darbo?

Вы вынуждены платить кому-то деньги чтоб получить работу?



### Are you being forced to live in accommodation against your will?

Czy jesteś zmuszany/ zmuszana do mieszkania w lokalu wbrew swojej woli?

Ar esate priversti gyventi nurodytose patalpose prieš savo valią?

Вы вынуждены жить в жилье против вашей воли?



### Is someone controlling your identity documents or bank account?

Czy ktoś ma kontrolę nad Twoimi dokumentami identyfikacyjnymi lub rachunkiem w banku?

Ar kas nors kontroliuoja jūsų tapatybės dokumentus ar banko sąskaitą?

Кто-то контролирует ваши документы, удостоверяющие личность или счет в банке?



### Is someone threatening or intimidating you or your family?

Czy ktoś grozi Tobie lub Twojej rodzinie?

Ar kas nors grasina arba gąsdina jus ar jūsų šeimą?

Кто-то угрожает или запугивает вам или вашей семье?

### If you think you or someone you know may be in a situation of forced labour get help:



**Tell someone you trust - a manager, worker representative or friend**

**YOUR LOCAL CONTACT:** KONTAKT LOKALNY, VIETINIS KONTAKTAS, МЕСТНЫЙ КОНТАКТ



**REPORT:** RAPORT, PRANEŠTI, СООБЩИТЬ

**Gangmasters & Labour Abuse Authority (GLAA): 0800 432 0804 (Confidential)**

**Police 999 (emergency) - Police 101 (not emergency)**



**GET HELP:** WEZWAĆ POMOC, GAUKITE PAGALBOS, ПОЛУЧИТЬ ПОМОЩЬ

**Modern Slavery Helpline: 08000 121 700**

(24/7, confidential)

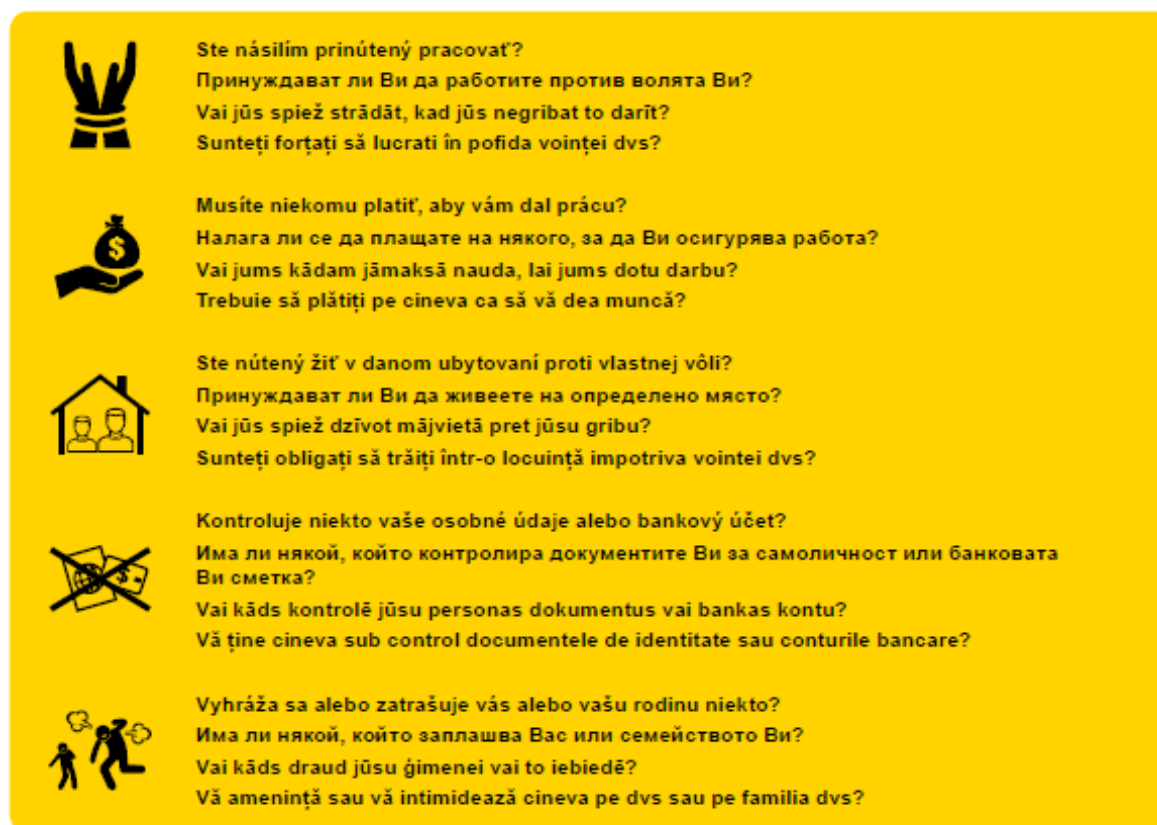
**stronger  
together**  
tackling modern slavery in supply chains

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Appendix C - Forced Labour (Slovakian, Bulgarian, Latvian and Romanian)

## IF YOU EXPERIENCE MORE THAN ONE OF THESE CONDITIONS YOU MAY BE A VICTIM OF FORCED LABOUR.



**Ste násilím prinútený pracovať?**  
Принуждават ли Ви да работите против волята Ви?  
Vai jūs spiež strādāt, kad jūs negribat to darīt?  
Sunteți forțați să lucrați în pofida voinței dvs?

**Musiți nekomu plăti, aby vám dal prácu?**  
Налага ли се да плащате на някого, за да Ви осигурява работа?  
Vai jums kādam jāmaksā nauda, lai jums dotu darbu?  
Trebuie să plătiți pe cineva ca să vă dea muncă?

**Ste nútený žiť v danom ubytovaní proti vlastnej vôli?**  
Принуждават ли Ви да живеете на определено място?  
Vai jūs spiež dzīvot mājvietā pret jūsu gribu?  
Sunteți obligați să trăiți într-o locuință împotriva voinței dvs?

**Kontroluje niekto vaše osobné údaje alebo bankový účet?**  
Има ли някой, който контролира документите Ви за самоличност или банковата Ви сметка?  
Vai kāds kontrolē jūsu personas dokumentus vai bankas kontu?  
Vă ține cineva sub control documentele de identitate sau conturile bancare?

**Vyhráza sa alebo ztrašuje vás alebo vašu rodinu niekto?**  
Има ли някой, който заплашва Вас или семейството Ви?  
Vai kāds draud jūsu ģimenei vai to iebiedē?  
Vă amenință sau vă intimidază cineva pe dvs sau pe familia dvs?

**If you think you or someone you know may be in a situation of forced labour get help:**



**Tell someone you trust - a manager, worker representative or friend**

**YOUR LOCAL CONTACT:** MIESTNY KONTAKT, МЕСТЕН КОHTAK, VIETÉJAIS KONTAKT, A LUA LEGATURA

**REPORT:** SPRÁVA, СЪОБЩАВАМ, ZIŅOT, A RAPORTA

**Gangmasters & Labour Abuse Authority (GLAA): 0800 432 0804 (Confidential)  
Police 999 (emergency) - Police 101 (not emergency)**

**GET HELP:** ZÍSKAJTE POMOC, ИЗВИКАЙ ПОМОЩ, IEGŪT PALÍDZĪBU, OBȚINE AJUTOR

**Modern Slavery Helpline: 08000 121 700  
(24/7, confidential)**

**stronger  
together**  
tackling modern slavery in supply chains

# stronger together

## tackling hidden labour exploitation



Are you being forced to work when you don't want to?



Do you have to pay someone money to give you work?



Are you being forced to live in accommodation against your will?



Is someone controlling your identity documents or bank account?



Is someone threatening or intimidating you or your family?

## YES? GET HELP!

**For advice, support and to report contact:**

A trusted manager or worker representative



**Modern Slavery Helpline: 08000 121 700 (confidential, 24/7)**  
[www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)



**Gangmasters and Labour Abuse Authority: 0800 432 0804 (confidential, office hours)**  
[intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)



**Police: 101 (non-urgent) 999 (emergency)**

[www.stronger2gether.org](http://www.stronger2gether.org)

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