



Modern Slavery Policy

This Modern Slavery Policy outlines Morrow Contracts commitment to identifying, preventing, and mitigating modern slavery and human trafficking within its operations and supply chains. As one of Northern Ireland's main utility contractors, we recognise our responsibility to ensure ethical labour practices and maintain compliance with all relevant legislation.

This policy applies to all employees, subcontractors, suppliers and business partners engaged with Morrow Contracts. We expect the same level of commitment from our partners to uphold ethical practices in their own operations and supply chains.

Morrow Contracts is committed to:

- Ensuring that modern slavery, forced labour, and human trafficking do not occur within our business, supply chains, or any projects we undertake.
- Creating a transparent, accountable environment where workers' rights are respected.
- Engaging in due diligence to monitor, identify, and address potential risks of modern slavery.

We adopt a proactive approach to assessing the risk to human rights within these areas and implement control measures to mitigate these risks.

These control measures include:

- We do not employ any person below the age of 16 in any part of our business.
- We do not discriminate against any employee on any grounds (including, but not limited to, age, sex, race, colour, nationality, ethnic origin, religion, disability, sexual orientation, gender, marital or civil partnership status, political beliefs, pregnancy or maternity, or trade union activity) and aim to ensure that our employees have equal access to training, development and promotion opportunities and are given the opportunity to perform their job role in an effective manner.
- We provide every employee with a rate of pay that is at least equal to the Real Living Wage in their basic pay. Apprentices and trainees are all paid at least the National Minimum Wage or National Living Wage. We also provide our staff with a range of additional employment benefits.
- We comply with relevant legislation and regulations relating to the working standards of our employees and subcontractors, including those on working hours.
- We have procedures in place to ensure that all employees and labour only subcontractors are eligible to work in NI/UK.
- All our suppliers are vetted, and this includes specifying that they must comply with all relevant labour-related legislation in the countries in which they operate and comply with the Modern Slavery Act 2015 and/or Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.
- We have fair and transparent disciplinary and grievance procedures, and we do not engage in, nor do we tolerate any type of mental, physical, sexual or verbal abuse.
- We comply with all applicable environmental and health and safety regulations. We provide a healthy and safe working environment and work diligently to manage and minimise the risks and hazards to our staff, subcontractors, customers and the public. Our company is certificated to ISO14001 and ISO45001 to assist with this.
- We respect the rights of local people when undertaking utility works and aim to undertake our activities in a manner that is considerate and in keeping with the surrounding community. We will, where practicable, consult with local communities prior to significant work being undertaken.
- All employees, particularly those in procurement, HR, and project management, receive mandatory ethics training on modern slavery, child labour and anti-bribery and corruption.



- We require our suppliers to report on their own supply chains to ensure that their subcontractors or labour providers are free from forced labour or exploitation.
- We have an individual responsible within the company for implementing modern slavery, child labour, anti-bribery and corruption policies. Any concerns are dealt by XXX.
- A grievance/complaints mechanism is in place, which is confidential and available to all stakeholders.

We will use the following formal reporting mechanisms to help our organisation to monitor compliance with this policy:

- Effectiveness is monitored using Key Performance Indicators (KPI's).
- We have a robust system of internal audits in place, and this will be used to check for compliance with the controls contained within this policy.
- Compliance with this policy will form an integral part of our management review and Board reporting procedures and governance.
- Quadra consulting undertake audits across the primary supply chain.
- We will openly and willingly participate in any audits by our customers or supply chain concerning compliance with this policy.
- We will undertake regular benchmarking of our approach to the management of human rights with similar organisations and will work to improve our controls where necessary.
- We will willingly participate in any national reporting mechanisms.
- We request policy documentation from main suppliers to ensure compliance with human trafficking and slavery laws of the country or countries in which they operate.

If suppliers are found to be non-compliant with Modern Slavery laws, Morrow Contracts will take actions to address the violation and prevent future occurrences.

- Require the supplier to stop any activities that contribute to modern slavery immediately.
- Temporarily suspend the supplier's contract while the issue is investigated, and corrective measures are put in place.
- Determine whether non-compliance stems from systemic issues, lack of awareness, or deliberate exploitation.
- Provide training to the supplier on modern slavery compliance, ethical recruitment practices, and workers' rights.
- Conduct frequent audits and spot-checks to monitor the supplier's progress in implementing corrective actions.
- Work to support the remediation of workers affected by modern slavery, including providing safe exit strategies, access to education or training, and alternate employment opportunities.
- Document the incident, actions taken, and outcomes for internal records and reporting purposes.
- Offer ongoing support to suppliers to build capacity for ethical labour practices and ensure long-term compliance.

Morrow Contracts are committed to eliminating all forms of modern slavery, forced labour, and human trafficking from all operations and supply chains.

- No employee shall pay recruitment fees, deposits, or any costs associated with their employment. All recruitment fees and expenses must be borne by Morrow Contracts. Violations by recruitment agencies or internal parties will result in termination of contracts.
- All overtime must be voluntary and appropriately compensated, without any coercion, threats, or penalties for refusal. A time tracking system is in place to monitor work hours.
- All employees have rights to organise, form, or join trade unions or workers organisations of their choosing. Morrow Contracts are committed to fostering an environment where workers feel safe exercising these rights.



- Morrow Contracts commit to taking immediate remediation to resolve violations, including terminating relationships with offending suppliers or contractors. Morrow Contracts will provide support to affected individuals, such as access to legal aid and reimburse any unlawful recruitment fees paid by employees.

This policy is regularly reviewed, at least on an annual basis, and revised if necessary.

Signed:

A handwritten signature in blue ink, appearing to read 'J. Morrow', is positioned below the 'Signed:' label.

Date:

18th December, 2024