

Modern Slavery Act Transparency Statement

Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and outlines the steps Morris & Spottiswood Group has taken during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in our operations and supply chains. We are committed not only to complying with legal requirements but also to fostering an ethical, fair, and responsible business environment.

Morris & Spottiswood Group adopts a **zero-tolerance approach** to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are not present in our business or supply chains. We are also committed to ensuring that workers are not exploited, that they are safe, and that employment standards (including pay and working time), health and safety laws, and human rights protections are adhered to.

We expect the same high standards from our suppliers and actively work with them to identify and mitigate risks of modern slavery.

This policy relates to the trading period of January-December 2025. During this period we have undertaken a full review of our policies and procedures in relation to the Modern Slavery Act 2015 and this policy reflects any new procedures that have been implemented. It also sets out the improvements planned for the next trading period.

Organisational Structure

Morris & Spottiswood Group is an independently owned company, registered in Scotland and operating wholly within the UK and Ireland. We directly employ approximately 600 people across our divisions: fit-out, housing, maintenance, M&E services, flooring, furniture consultancy, builders merchant and carbon consultancy. We also engage freelance operatives and site managers on a temporary basis. More information about our business and organisational structure is available on our website: www.morrisandspottiswood.co.uk

Key Updates Since Last Statement

Within the last 12 months we have:

- Employed a Group Supply Chain Manager to ensure that our supply chain due diligence processes are adequate and fit for purpose
- Implemented supply chain audits with our high risk subcontractors and all our agencies
- Implemented external training for colleagues in influential areas
- Updated existing HR policies and procedures inline with legislation and best practice
- Introduced an online whistleblowing portal to ensure that colleagues feel comfortable with reporting concerns confidentially and anonymously

During the next 12 months we plan to:

- Introduce awareness training for all subcontractors actively engaged on our sites
- Undertake Procurement specific training for our Procurement team
- Implement a cross-functional working group consisting of HR, Health & Safety and Supply Chain to review risks and trends in modern slavery and assess supply chain performance
- Set targets for supply chain audits to allow monitoring of progress
- Roll out external training to all colleagues

Governance & Accountability

To ensure robust compliance with the Modern Slavery Act, we will establish a **Modern Slavery Compliance Group**, consisting of representatives from HR, Procurement, HSQE which meets quarterly to:

- Review risks and trends in modern slavery.
- Assess supplier due diligence processes.
- Monitor the effectiveness of our training programs and compliance efforts.
- Report findings to the Executive Board.

Our Executive Board maintains overall responsibility for ensuring compliance and are supported by our HR Director and Group Supply Chain Manager who drive continuous improvements in our anti-slavery measures both internally and externally.

Our Policies & Due Diligence

Morris & Spottiswood Group has a long-standing commitment to ethical business conduct, supported by policies designed to mitigate modern slavery risks, including:

- **Anti-Slavery Policy** (approved by the Board and reviewed annually).
- **Ethics Policy** (covering responsible business practices).
- **Recruitment & Selection Policy** (ensuring fair employment practices).
- **Whistleblowing Policy** (providing a secure channel for reporting concerns).
- **Supplier Code of Conduct** (outlining our expectations for suppliers regarding human rights and labour practices).

Our **supplier due diligence** includes:

- Risk assessments identifying **high-risk areas** within our supply chain.
- Pre-qualification checks requiring suppliers to confirm compliance with the Modern Slavery Act.
- Contractual obligations for all suppliers and subcontractors to meet anti-slavery requirements.
- Mechanism for monitoring and auditing high-risk subcontractors and those where concerns are raised.

In cases where suppliers fall short of our standards, we engage with them to implement corrective action plans within a defined timeframe. Persistent failure to meet requirements may result in contract termination.

Our People & Training

To ensure modern slavery is prevented within our own operations:

- All new employees undergo **pre-employment vetting**, including right-to-work checks and background screening.
- Our **Anti-Slavery Policy** is communicated to all employees via internal channels and construction site noticeboards.

- We deliver **mandatory modern slavery training** for employees in procurement, HR, and site management.
- Annual refresher training will be provided to maintain awareness of modern slavery risks.
- Employees are required to report any concerns regarding modern slavery to the HR Director, with reports investigated within 7 days.

Monitoring & Auditing

Morris & Spottiswood Group monitors compliance with modern slavery laws through:

- **Regular audits** of suppliers, prioritising high-risk categories.
- **Site audits** by our HSQE team, ensuring no evidence of forced labour or human trafficking.
- **Employee surveys** to identify potential risks or concerns regarding fair treatment.
- **Whistleblowing hotline**, managed by an independent third party, allowing employees and external stakeholders to report concerns anonymously.

Key Performance Indicators (KPIs)

We measure the effectiveness of our anti-slavery measures using the following KPIs:

- Percentage of **high-risk suppliers audited annually** (target: 100%).
- Percentage of **employees completing modern slavery training** (target: 100%).
- Number of **modern slavery concerns raised and resolved**.
- Level of **supplier engagement with our modern slavery requirements** (target: 100%).

These KPIs are reviewed annually by the Board to ensure their continued effectiveness.

Reporting & Breaches

Morris & Spottiswood Group takes breaches of its anti-slavery policies seriously:

- **Employees** found in breach of our policies will be subject to disciplinary action, up to and including dismissal.
- **Suppliers** failing to meet our modern slavery requirements will be given an opportunity to address issues. Failure to comply will result in contract termination and removal from our approved supplier list.
- All reported breaches will be investigated promptly, with outcomes reviewed by the Compliance Group.

Signed



George Morris
Chairman

January 2026