



Morson Group

Ethics & Code of Conduct Policy

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Signatories

	Name	Signature	Date
Created By:	Joseph Mason		21/08/2020
Checked By:	Becki Ross		21/08/2020
QA Approval:	Gareth Morris		21/08/2020
MG Approval:	Ged Mason		21/08/2020

Main Purpose and Scope

The purpose of this policy is to promote honest, ethical 'conduct' from our staff, sub-contractors and suppliers and their activities which will maintain the trust of our employees, clients and contractors. This 'Ethics and Code of Conduct' encompasses all employees and suppliers of the Morson Group and its subsidiaries ("Morson") and all of its national and overseas subsidiaries.

Principles of the Code

The Morson Group will comply with all laws, regulations and legislation that applies to each of our policies and procedures which have been referenced in section 5. Below is a summary of the key principles underpinning our ethos.

No Conflicts of Interest

ALL conflicts of interest **MUST** be disclosed where any may be perceived to exist. A conflict of interest occurs when an employee's private interests interfere in anyway – or appear to interfere – with the company as a whole. This may include:

- Actions or interests of an employee that may make it difficult to perform his/her work efficiently and objectively.
- Ownership or substantial management control by an employee or a member of their family, of an outside concern that does a material amount of business with any part of the Morson Group
- Indebtedness to a competitor company

Law Abiding

The activities of Morson must always be in full compliance with all laws, rules and regulations of the jurisdiction in which Morson conducts its business. Any uncertainties as to whether a contract, transaction or course of conduct complies with the laws, rules and regulations to which Morson is subject should be discussed with relevant management personnel and the employee should act in accordance with this advice.

Fair Treatment

Morson will at all times:

- Show no preference or advantage
- Behave without prejudice
- Intend to be clear, honest and realistic and never intentionally induce misperception
- Have open communication with its clients and contracts and swift response times
- Expect its employees to deal fairly with the Morson Group's customers, suppliers and competitors and will win or award business based in excellence of service and competitive pricing.

Integrity

Employees are expected to perform their duties in a manner that advances the company's legitimate interests. Employees are prohibited from:

- Using Company property or information or their position in the company for their own personal gain
- Competing with the company

Group Policies and Procedures

Please refer to the ANNEX A section 8 which gives a list of Group Policies and Procedures and the document references. These are reviewed annually and also when changes are made throughout the year.

Monitoring Compliance and Reporting Violations

The Head of HR, supported by the HSQE Director, is authorised to formulate, implement and audit rules, procedures and educational programmes designed to promote the effectiveness of this policy. The Head of HR will report to the Morson Group Board who approve all policies and procedures and become involved with disciplinary action when necessary.

The HR Department will be responsible for monitoring any complaints or grievances against

- individual employees
- departments
- the company as a whole.

Morson is committed to supporting employees in meeting and maintaining the ethical standards presented in this code of conduct. To this end, Employees are encouraged to talk to line managers, the HR Manager or the Quality Manager when in doubt about the best course of action in any given situation.

If an employee becomes aware of anything that occurs which could in any way be construed as a fraudulent or illegal act, or an act that in any way violates this code, the employee is responsible for reporting this to the HR Manager who shall be able to take the necessary course of action.

Any violations of this code or failure to co-operate with an internal investigation of an actual or apparent violation of this code may constitute grounds for corrective action. This may include immediate dismissal.

Supplier Code of Conduct

The Morson Group expect all our suppliers, i.e., all companies who do business with Morson, to adhere to the same ethical principles. For this purpose, Morson outlines our Supplier Code of Conduct, which sets the standards for doing business with us.

Our Supplier Code of Conduct captures the principles that we expect our suppliers to uphold. It contains UK and globally aligned standards and guidance in each of the following areas:

- Compliance to the Modern Slavery Act 2015 (as amended)
- Child labour - The supplier employs no children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development (reference: ILO Convention 138(7)).
- Voluntary employment/forced labour and human trafficking - The supplier shall make no use of forced or compulsory labour.
- Abuse, harassment, disciplinary action.
- Fair and equal treatment/non-discrimination.
- Compensation, working hours and benefits - The supplier shall comply with the respective national laws and regulations regarding working hours, wages and benefits.
- Freedom of association and collective bargaining
- Health and safety - We expect our suppliers to strive to implement the standards of occupational health and safety at a high level. The supplier complies with

applicable occupational health and safety regulations and provides a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses.

- Environment – The supplier shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.
- Ethical business practices – The supplier shall comply with all laws applicable to its business. The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.

Business Continuity Planning

The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness especially includes disaster plans to protect both employees and the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

Improper Payments/Bribery

The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010. In particular, the supplier may not offer services, gifts or benefits of Morson employees in order to influence the employee's conduct in representing the Morson Supply Chain.

We revise our Code every two years to align with pertinent emerging legislation, best practice and stakeholder expectations.

We seek to ensure that the Supplier Code of Conduct reflects emerging new standards, building on the International Labour Organization and other recognized standards already reflected in the code. The Code also is aligned with the U.K. Bribery Act. The due diligence process associated with this Code is aligned with the United Nations Guiding Principles on Business and Human Rights.

Contact us and report concerns

If you are a supplier looking for more information on the Morson Responsible Supply chain, please engage our compliance department directly.

Suppliers are responsible for prompt reporting of actual or suspected violations of laws, our Supplier Code of Conduct, and/or any contractual relationship with Morson. This includes violations by any employee or agent acting on behalf of either the supplier or Morson. Morson also encourages all suppliers to implement confidential and anonymous means for employees to raise grievances.

Compliance with the Supplier Code of Conduct

Morson reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. Morson encourages its suppliers to implement their own binding guidelines for ethical behaviour.

The supplier encourages its suppliers to adhere to the ethical standards, human rights, health and safety standards and environmental standards upon which this agreement is based, as part of fulfilling their contractual obligations.

Any breach of the obligations stipulated in this Supplier Code of Conduct is considered a material breach of contract by the supplier.

Amendment Record

Issue No	Issue Amendments	Date	Issued By
1	Initial issue	October 2017	Becki Ross
	Reviewed No Change	August 2019	Becki Ross
2	Section 7 – referenced the Modern Slavery Act 2015 (as amended) Rebranded	August 2020	Joseph Mason