



Morson Group

Ethics & Code of Conduct Policy

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1. Document Control

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	Name	Signature	Date
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Checked By:	Katie Winstanley		07/08/2023
QA Approval:	Gareth Morris		07/08/2023
MG Approval:	Ged Mason		07/08/2023

2. Introduction

The purpose of this policy is to promote honest, ethical conduct from our colleagues and suppliers and their activities in order to maintain the trust of our employees, clients and contractors.

3. Scope

The policy covers all individuals employed by Morson Group as well as those engaged with the Group in the capacity of consultants, contractors, casual and agency staff (hereafter referred to as “colleagues”).

This policy does not form part of your Contract of Employment. We may vary this policy at any time.

4. Principles

4.1. No conflicts of interest

A conflict of interest occurs when a colleague’s private interests interfere – or appear to interfere – in any way with the interests of the company. This may include:

- Actions or interests of a colleague that may make it difficult to perform their work efficiently and objectively
- Ownership or substantial management control by a colleague or a member of their family of an outside concern that does a material amount of business with any part of the Morson Group
- Personal relationships with any candidates seeking employment with the Morson Group
- Indebtedness to or involvement with a competitor company

All conflicts of interest must be disclosed where any may be perceived to exist.

4.2. Adherence to Law

The activities of Morson Group must always be in full compliance with all laws, rules and regulations of the jurisdictions in which the Group conducts its business. Any uncertainties as to whether a contract, transaction or course of conduct complies with the laws, rules and regulations to which the Group is subject should be discussed with their manager or the HR department and the colleague should act in accordance with the advice given.

4.3. Fair Treatment

Morson Group will at all times:

- Show no undue preference or advantage
- Behave without prejudice

- Intend to be clear, honest and realistic and never intentionally create misperception
- Have open communication with its clients and contracts and swift response times
- Expect its colleagues to deal fairly with customers, suppliers and competitors and will win or award business based on excellence of service and competitive pricing

4.4. Integrity

All colleagues are expected to perform their duties in a manner that advances the Group's legitimate interests. Colleagues are prohibited from:

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

5. Monitoring compliance and reporting violations

The Group HR Director, 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 Group HR Director will report to the Executive 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 colleagues
- Departments
- The company as a whole.

Morson Group is committed to supporting colleagues in meeting and maintaining the ethical standards presented in this code of conduct. To this end, colleagues are encouraged to talk to their line manager, a member of the HR department or the HSQE team when in doubt about the best course of action in any given situation.

If a colleague 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 colleague is responsible for reporting this to the Group HR Director who will 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 disciplinary action. This may include immediate dismissal.

6. Supplier Code of Conduct

Morson Group expect all our suppliers and business partners to adhere to the same ethical principles to which we hold ourselves accountable. The Morson Group Supplier Code of Conduct sets the standards for doing business with us.

6.1. Principles

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.
- 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 colleagues 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.

6.2. 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 includes disaster plans to protect both colleagues and the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

6.3. 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 to Morson Group colleagues in order to influence the colleague'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.

6.4. Anti-Money Laundering

At Morson we take our core values seriously, including behaving responsibly and ethically. Morson Group are fully committed to complying with all legislation and appropriate guidelines designed to prevent financial crime, where applicable to the Group, and to combat money laundering activity and the funding of terrorist or criminal activity.

Morson carries out (proportionate) sanction, identification and due diligence checks across our client and supply chains at the start of business relationships and ongoing where appropriate.

All relevant colleagues will receive the appropriate training required in order to manage the risk.

We also ensure the commercial substance of transactions is understood and that appropriate contractual documentation is in place.

Morson are committed to ensuring that any suspicions that a money laundering offence has been or is being committed are reported to the appropriate authorities.

6.5. Contacting us and reporting concerns

If you are a supplier looking for more information on the Morson Group Responsible Supply chain, please engage our HSQE team 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 colleague or agent acting on behalf of either the supplier or Morson Group. Morson Group also encourages all suppliers to implement confidential and

anonymous means for employees to raise grievances.

6.6. Compliance with the Supplier Code of Conduct

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

The supplier must encourage 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.

7. 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)	August 2020	Joseph Mason
	Rebranded		
3	Reformatted	January 2021	Heather Deering
	Rebrand Review	June 2021	Joshua Stodel
4	Amendments – Group HR Director	June 2022	Chloe Edwards
5	Addition of 6.4 to cover anti-money laundering	June 2022	Joshua Stodel
6	Amendment – ‘their’ replacing ‘he/she’ and reformatted	July 2023	Aaron Leigh