

# Modern Slavery and Human Trafficking Annual Statement for the Financial Year 2025-2026

## Introduction

*This statement is made pursuant to section 54(1) of The Modern Slavery Act 2015 and constitutes the Morson Group slavery and human trafficking statement for the financial year ending March 2026.*

*Modern Slavery is a term used to encapsulate two offences in the Modern Slavery Act 2015.*

- *Slavery, servitude and forced or compulsory labour*
- *Human trafficking*

## Our Commitment

*Morson Group have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.*

*We have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety, human rights laws and international standards are adhered to, including freedom of movement and communications. We are committed to improving our practices to combat slavery and human trafficking, which is driven by the Executive Board throughout the Group. This commitment is reflected in our external certifications and accreditations which recognises our performance in areas including ethics, labour and human rights, and sustainable procurement. This accreditation supports our ongoing efforts to mitigate risks, including those related to modern slavery.*

## The Nature of our Business

*Morson Group is a leading global workforce and consultancy partner, delivering specialist talent, technical expertise and productivity-focused solutions across aerospace and defence, energy and nuclear, infrastructure and transportation, technology, and engineering-led sectors. Operating as an integrated ecosystem, the Group employs approximately 2190 employees who bring together consultancy, recruitment, workforce deployment, and skills development to solve complex capability challenges at pace and scale.*

*Morson Group UK companies consist of:*

- *Mercury Midco 1 Ltd*
- *GGM Holdings Ltd*
- *GGM Human Resources Ltd*
- *MMGG Acquisitions Ltd*
- *Morson Group Ltd*
- *Morson Holdings Ltd*
- *Morson Human Resources Ltd*
- *Morson Projects Ltd*
- *Vital Human Resources Ltd*
- *Bridge Technology Partners Ltd*
- *Anderselite Ltd*
- *Morson Training*
- *3B Training Ltd*
- *Aurora Power Consulting Ltd*
- *GPS Holdings Ltd*
- *Grosvenor Power Services Ltd*

- Grosvenor Transformer Services Ltd
- Grosvenor Oil Services Ltd
- Anderselite Holdings Ltd
- Waldeck Associates Ltd
- Waldeck Holdings Ltd
- Morson Cyber Security Ltd
- Beacon Computer Services Ltd
- Caneline Ltd
- Cornwallis Elt Ltd
- InterQuest Group (UK) Ltd
- Astraeus Consulting Ltd
- Orange Solutions Ltd

## Our Policies

Our Modern Slavery and Human Trafficking Policy is designed to prevent all forms of exploitation within our operations and supply chain. Employees are expected to comply to the policy, promptly report any concerns and utilise the appropriate reporting mechanisms. Within the Morson Group of companies in the UK, we have the following policies and procedures relating to Slavery and Human Trafficking which are embedded into our management systems:

- Modern Slavery & Human Trafficking Policy
- Health and Safety Policy
- Sustainability Policy
- Quality Policy
- Anti-Corruption, Anti-Bribery & Anti-Competitive Practices Policy
- Safeguarding Policy
- Environmental, Social and Governance Policy
- Ethics and Code of Conduct Policy
- Procurement, Supplier Qualification and Evaluation Procedure
- Equity, Diversity & Inclusion Policy
- Whistleblowing Policy

## Our Supply Chain

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery & Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships. We implement and enforce effective systems and controls designed to prevent slavery and human trafficking within our business and supply chains. These controls are supported by the Modern Slavery & Human Trafficking Policy, Ethics and Code of Conduct Policy, and Procurement, Supplier Qualification and Evaluation Procedure.

Morson procures products and services in order to sustainably develop its business. The key areas of procurement are:

- IT hardware, software and telecommunications
- Vehicles
- Medical and medical testing services
- Stationary
- Office furniture
- Personal Protective Equipment and workwear
- Training services
- Travel services
- Legal, HR, Marketing & Branding Services

- Utilises (energy, water)

## **Identification of Potential Risk of Slavery and Human Trafficking Areas in the Business**

Morson has identified the following business areas as the most significant potential risk:

- The provision of agency labour
- The supply chain

### **The Provision of Agency Labour**

**1. The potential risk**

*Enslaved or human trafficked individuals are placed in work as agency labour with a client*

**2. Risk control**

*Morson undertakes rigorous checks on each individual including eligibility to work in accordance with Home Office requirements, references, qualifications, proof of NI (UK), and bank details to ensure each person is acting in their own right.*

### **The Supply Chain**

**1. The potential risk**

*The use of suppliers that contravene the Modern Slavery Act 2015*

**2. Risk control**

*Suppliers are assessed using a risk-based approach considering factors such as service type, labour provision, geographic location, and the nature of the goods or services supplied. Within the Supplier Questionnaire, suppliers are required to complete a dedicated section on Modern Slavery and declare their adherence to the Modern Slavery Act 2015. Suppliers are expected to maintain appropriate policies, controls and due diligence processes to prevent modern slavery within their own operations and supply chains.*

*Morson reserves the right to terminate relationships with suppliers found to be in breach of applicable modern slavery legislation or unwilling to demonstrate appropriate controls.*

## **Due Diligence Process for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk:

- We conduct internal audits on our recruitment and onboarding process to ensure that only eligible workers are engaged for agency work.
- We thoroughly review Supplier Questionnaires before approving a supplier in accordance with our Procurement, Supplier Qualification and Evaluation procedure.
- Our point of contact with national or international supply chains is often with a UK company. We expect these entities to have suitable anti-slavery and human trafficking policies and processes. It is not practical for us to have a direct relationship and influence with all levels in the supply chain.
- We request that suppliers complete the Supplier Questionnaire at set frequencies to ensure new or changed information relating to their organisation is captured and reviewed.
- Dedicated Eligibility to Work team as part of the assurance process.

## Our Effectiveness in Combating Modern Slavery and Human Trafficking

We measure the effectiveness of our risk control measures and due diligence to ensure that slavery and human trafficking is not taking place in our business or supply chains. The Key Performance Indicators used during the reporting period included:

- Recruitment and onboarding procedures were subject to internal audit during the reporting period with no significant non-conformities identified.
- Eligibility to Work assurance activities continued across agency worker onboarding processes.
- Supplier due diligence processes continued to include modern slavery compliance checks.
- No substantiated incidents of modern slavery were identified during the reporting period.
- Supplier appraisal and qualification activities continued in accordance with the Procurement, Supplier Qualification and Evaluation Procedure.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains we provide relevant information and training to all employees via our HR induction, onboarding and on-going mandatory training, company intranet and various forms of communication to help identify indicators of modern slavery and understand escalation procedures. Our policies are reviewed regularly, and we communicate them to employees through awareness initiatives to ensure they understand how to comply with legal requirements and act in an ethical and responsible manner.

## Reporting

Employees, workers, suppliers and other stakeholders are encouraged to report concerns regarding suspected modern slavery through the Group's whistleblowing procedures, which allow concerns to be raised confidentially and without fear of retaliation.

## Areas of Improvement

Over the past financial year, we have implemented a number of measures to strengthen our approach to preventing modern slavery and human trafficking. These include:

- Successfully maintained certificated management systems, demonstrating the strength and effectiveness of our operational processes
- Strengthened our supplier onboarding processes, including enhanced due diligence and risk-based assessments
- Conducted internal modern slavery audits to assess the effectiveness of our existing controls, and identify areas for further development
- Increased internal awareness through targeted communications to ensure employees understand how to identify and report potential risks
- Enhanced oversight of third-party labour providers, including greater scrutiny of intermediaries such as umbrella companies

These measures form part of our ongoing commitment to continuous improvement and reflect our proactive approach to managing modern slavery risks.

## **Continuous Improvement**

*During the next financial year Morson Group intends to:*

- *Continue enhancing supplier due diligence processes*
- *Review modern slavery risk assessment criteria*
- *Increase awareness training across the business*
- *Monitor legislative and best practice developments*

*This statement was approved by the Board of Directors of Morson Group Ltd on 26/05/2026 and is reviewed annually.*



**Ged Mason - Morson Group Executive Chairman**



**Gareth Morris - Morson Group HSQE Director**