



MoreLife Modern Slavery policy

Introduction

This Policy sets out MoreLife's approach to identifying and managing all potential modern slavery risks related to its business and to establish protocols intended to prevent modern slavery or human trafficking.

MoreLife recognises that it has a responsibility to take a zero tolerance approach to modern slavery and human trafficking, by ensuring that its organisation and supply chain is free from such activity. To this end, MoreLife has set out the activities that it will undertake during this financial year.

Organisational structure and supply chains

This statement covers the activities of MoreLife and its operations in the United Kingdom.

MoreLife operates a local and regional supply chain with a preference for long term business relationships.

MoreLife's aim is to improve performance by embedding risk management into the core of what we do and ensure it is key to our corporate strategy. This applies to our Modern Slavery Policy which allows the business to support sound decision-making both internally and across our supply chain.

MoreLife has assessed the following activities and considers them to be potentially high risk of slavery and human trafficking:

Supplier Due Diligence – The process by which MoreLife requests evidence from suppliers to support their conformity to the Modern Slavery Law.

Negotiation and Contracting – The assessment process to ensure contractor commitment to meet the set of rules and regulations required to work with MoreLife.

Supplier Management – The process of managing interactions with contractors who supply goods and/or services to MoreLife.

Responsibility

Responsibilities for the MoreLife anti-slavery initiatives are as follows:

Policies: HR, Finance and Operations teams are responsible for putting in place and reviewing this policy statement and the process by which it has been developed.

Risk assessment: A human rights and modern slavery risk analysis is undertaken as a structured, controlled and coordinated process. Risk reporting is built on existing departmental level reporting and is discussed and reviewed as part of our risk management strategy.

Where risks are deemed significantly important they are escalated in accordance with corporate procedures and reviewed for impact against the corporate strategy:

Investigations/due diligence: As part of the MoreLife due diligence process Finance reviews supplier and contractor human rights and modern slavery controls at the point of engagement. Thereafter MoreLife continues to monitor compliance against suppliers at predetermined

intervals once a business relationship has been established. Where suppliers and contractors fail to provide evidence of compliance they are removed from the preferred supplied list with immediate effect.

Training: MoreLife is committed to providing modern slavery awareness training for staff.

Relevant Policies

MoreLife operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy – MoreLife encourages all its staff and workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of MoreLife. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. MoreLife's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Staff code of conduct – The MoreLife code of conduct makes it clear to staff the behaviour expected of them. MoreLife strives to maintain the highest standards of conduct and ethical behaviour when operating in the UK and abroad and managing its supply chain.

The Procurement code of conduct – MoreLife is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. MoreLife works with suppliers to ensure they meet the standards of the code and improve their staff working conditions. However, serious violations of MoreLife's supplier code of conduct will lead to the termination of the business relationship. The following process and steps will be taken to implement the code of conduct in relation to slavery and human trafficking, including examples where action has been taken to address specific slavery and human trafficking risks.

The Recruitment policy – MoreLife uses only specified, reputable employment agencies to source prospective staff and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

MoreLife undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. MoreLife's due diligence and reviews include:

Evaluating the modern slavery and human trafficking risks of each new supplier.

Conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified.

Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking.

Performance Indicators

MoreLife has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015.

Training



MoreLife requires all staff within the organisation to complete e-learning training on modern slavery and trafficking as a module within MoreLife's Virtual College training programme.

Reference to Modern Slavery is also contained within the staff handbook which is updated on a regular basis.

Originator of Policy:	Katherine Sage
Authorised signatory for Policy:	Professor Paul Gately, Managing Director
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