

Anti-Slavery and Human Trafficking Policy Statement

Introduction

This overarching policy document provides an overview of modern slavery and human trafficking which is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Moston Consultants Ltd have a zero-tolerance approach to modern slavery and human trafficking and 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 and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

Purpose & Scope

Moston Consultants Ltd values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the firm's behalf are key to maintaining these standards.

The purpose of this document is to set out Moston Consultants Ltd policy in relation to modern slavery and human trafficking. The policy applies strictly to all employees, directors, consultants, contractors and to any other people or bodies associated with Moston Consultants Ltd.

Policy

Moston Consultants Ltd are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Moston Consultants Ltd expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The policy applies strictly to all employees, directors, consultants, contractors and to any other people or bodies associated with Moston Consultants Ltd.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the Policy

- Moston Consultants Ltd Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it
- Moston Consultants Ltd procurement has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- Moston Consultants Ltd managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- Employees and any other people or bodies associated with Moston Consultants Ltd are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to Moston Consultants Ltd Managing Director.

Compliance with the policy

- You must ensure that you read, understand, and comply with this policy.
- The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Moston Consultants Ltd or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify management as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify Moston Consultants Ltd Managing Director as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with management or Moston Consultants Ltd Managing Director.

Moston Consultants Ltd aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Moston Consultants Ltd are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform Moston Consultants Ltd Managing Director immediately.

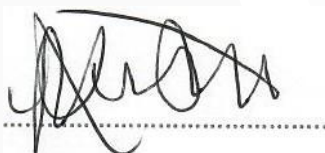
Communication and awareness of this policy

Communication of this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Isobel Rushall
Managing Director

Thursday, 16 May 2024