

## **MODERN SLAVERY STATEMENT**

This statement is made on behalf of Morphy Richards Limited ("Morphy") pursuant to Section 54(1) of the Modern Slavery Act (the "Act") and constitutes its slavery and human trafficking statement for the financial year ending 30<sup>th</sup> September 2019.

Morphy is a limited company registered in England and Wales (company number 00644702).

### **Introduction from the Managing Director**

As a key provider in the small domestic appliance sector, the business always works to the highest ethical standards and ensures that it complies with all laws, regulations and rules that are relevant to its business.

Slavery and human trafficking are totally unacceptable and the business will not tolerate forced labour of any description within the company or in its supply chains. The business recognises its moral and legal responsibility to help prevent modern slavery and human trafficking and commit to taking robust and effective steps to ensure no such activities arise in the operation of the business.

The aim of the business is to achieve the highest ethical standards in this regard and as a minimum, will comply with all relevant legislation. All employees of the company have a responsibility to be alert to the risks of modern slavery and human trafficking in their daily activities. With that in mind, employees are expected to report to management any concerns that an employee may have in this regard and managers are expected to act upon any concerns raised without delay.

This statement sets out the action that the business has taken to identify, understand and address risks of modern slavery and human trafficking in its business and supply chains. It also sets out the steps put in place aimed at ensuring that there is no slavery or human trafficking in the business or supply chains.

### **Responsibility**

Responsibility for the business' anti-slavery initiatives is as follows:

- **Overall**

The business' HR Manager has been appointed as the key contact for issues relating to modern slavery and human trafficking within its UK operations. The business' Commercial Director has been appointed as the key contact for modern slavery and human trafficking issues within its supply chains.

- **Risk Assessments**

For the business' supply chains, its Quality department are responsible for carrying out the modern slavery and human trafficking risk analysis.

## **Relevant Policies**

Morphy has in place the following policies that set out its approach to the identification and prevention of modern slavery and human trafficking within the business and its supply chains.

- **Ethical Trading & Code of Conduct Policy**

The business' commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within its supply chains is reflected within its Ethical Trading and Code of Conduct Policy.

The business is committed to ensuring that its suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide their workers with safe working conditions, treat them with dignity and respect, and act ethically and within the law in their use of labour. Serious breaches of the business' Ethical Trading and Code of Conduct Policy shall lead to the termination of the business relationship.

The business' Ethical Trading and Code of Conduct Policy sets out the standard of ethical conduct that it expects from suppliers to the business. All suppliers are expected to adhere to the business' Ethical Trading and Code of Conduct Policy and to ensure that they comply with it, with major emphasis on areas which are to be considered to be at higher risk. The Ethical Trading and Code of Conduct Policy also sets out the implications for a supplier of acting in breach, including termination of the business relationship.

- **Whistleblowing Policy**

The business encourages all of its employees, workers, customers and other business partners to report any concerns related to activities within the business or in its supply chains. This includes any circumstances that may give rise to an increased risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

## **Due Diligence and Compliance**

As part of the business' initiative to identify and mitigate risk, the business undertakes due diligence when considering working with potential new suppliers and regularly reviews the business' existing suppliers against the same criteria. The due diligence and reviews include:

- Assessing whether or not particular activities, countries or regions are high risk in relation to slavery or human trafficking by conducting supplier audits or assessments;
- Taking steps to improve any substandard supplier practices including the provision of advice to suppliers through the audit and assessment process and face to face meetings on supplier premises;

- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate the business' Ethical Trading and Code of Conduct Policy, including the termination of the business relationship; and
- Suppliers are requested to confirm in writing that they shall adhere to the business' Ethical Trading and Code of Conduct Policy.

### **Measuring Performance**

In order to measure the business' effectiveness in ensuring that modern slavery and human trafficking is not taking place within its business or supply chains, it is:

- Continuing to adapt the system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Conducting a review of its existing supply chains, expected to be completed within 2017, whereby the organisation evaluates all existing suppliers.

### **Training**

The business requires that all key staff within our supply chain complete training on modern slavery to ensure that they understand the risks of modern slavery and human trafficking infiltrating the business or its supply chains.



Vicky Philemon  
Managing Director  
Morphy Richards Limited

Dated 8<sup>th</sup> March 2019.