

Modern Slavery Statement

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Version Control:

Version	Date	Notes	Completed by
V0.1	01/02/2022	Initial release replacing pre-Expleo version	Hannah-Louise Gillies
V0.2	16/05/2022	Update re third party Due Diligence platform, internal training, and external regulatory environment	Hannah-Louise Gillies
V0.3	16/05/2023	Reviewed and confirmed content for 2023	Hannah-Louise Gillies
V0.4	30/07/2024	Update re Moorhouse's business and Our Effectiveness. Approved by Board	Sofia Tagliaferri / Jon Russell



1. Purpose

Moorhouse Consulting Limited (hereinafter “Moorhouse”) is a UK-based affiliate of Expleo SAS (hereinafter, together with its subsidiaries and affiliates, “Expleo”), which is based in Montigny-le-Bretonneux, France. Expleo has a global footprint in 30 countries and has prepared this Statement in compliance with the UK Modern Slavery Act of 2015.

Expleo is committed to upholding international human rights principles and standards, including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organisation (ILO) Core Conventions that address child labour, forced labour, non-discrimination, and the freedom of association.

Human rights principles and standards guide all of Expleo’s interactions with its employees, suppliers, customers, partners, and the communities in which it operates. This Statement supports Moorhouse’s other policies and processes to limit its exposure to risks of modern slavery in its supply chain.

These policies and processes include:

- Business Standards
- Code of Conduct
- Supplier Code of Conduct
- Do-We-Bid Process
- Whistleblowing Policy
- Anti-Corruption and Bribery Policy
- Anti-Fraud Policy
- Information Security
- Equality, Inclusion and Diversity Policies
- Recruitment Processes
- ISO9001 Quality Management System

We shall annually review our practices, processes and procedures in relation to our business operations and supplier engagement to ensure mitigation of risk of non-compliance with the Modern Slavery Act. Moorhouse continues to encourage conversations between key stakeholders to highlight and discover areas of risk of Modern Slavery in our business.

As our business grows, we will continue to deepen our understanding of the potential human rights impacts associated with our activities and the business we conduct, and will look to strengthen the tools and processes we manage.

2. Moorhouse & its supply chain

2.1 Moorhouse’s business

Moorhouse is a management consulting firm known for helping clients solve complex challenges related to organisational design, operating models, performance improvement, sourcing and procuring digital technology, and large-scale transformations.

Moorhouse currently has a growing number of permanent employees based in the UK, and access to a large pool of associate employees that we can draw upon when additional resources or expertise, which we do not already possess in-house, are required. We are dedicated to maintaining a fair and ethical workplace for all our employees and to ensuring compliance with all applicable legislation.

2.2 Moorhouse’s Values

We strive to promote a cohesive professional environment where everyone is encouraged to



be their authentic selves. Our culture defines the way we work and embodies our values:

- **Collaboration** – Working together continues to be the key to our success.
- **Integrity and Accountability** – We are reliable. We celebrate our successes and learn from our failures.
- **Courage** – We are bold thinkers who do the right thing and try to inspire others to do the same.
- **Humour and perspective** – We take our work seriously, but not ourselves.

Our Culture Quad is responsible for connecting our values to life at Moorhouse. They act as champions and protectors of our values, leading meaningful initiatives and events that bring us together.

Furthermore, as a business we are striving to make a difference in 3 specific areas as part of our commitment to Social Value and Sustainability:

- **People** – developing people
- **Equality** – promoting equality
- **Planet** – protecting our planet

Meeting our own needs without compromising the ability of future generations to meet theirs is fundamental to us at Moorhouse, and we are putting in place initiatives that make us a responsible business.

Together with our Group Code of Conduct, we have created a culture around our values and seek to live them in what we do and say every day.

Our Code of Conduct represents the standards expected from our staff as we conduct business throughout the world. The Group adheres to the principles and values laid down in the United Nations Universal Declaration of Human Rights, which recognises, in particular: the right for respect and dignity, the prohibition of any form of discrimination, the freedom of assembly and association, the freedom of opinion and expression as well as the right to work and equal pay for equal work. The Group does not tolerate any form of discrimination, particularly in the recruitment process or in the workplace, based in particular on race, ethnic origin, age, nationality, country of origin, religion, gender, sexual orientation, sexual preference, disability, social origin, and any other factor protected by law. Our reputation, as well as the trust we build with our clients and the public, depends on the conduct of each and every one of us. Appropriate ethical attitude is a basic requirement of establishing a healthy and successful day-to-day business environment.

The fundamental principles and regulations we follow include: Universal Declaration of Human Rights, UN Global Compact, UN Principles for Business and Human Rights, and OECD Guidelines for Multinational Enterprises.

2.3 Moorhouse's supply chain

We have zero tolerance towards any form of modern slavery or human trafficking and expect all organisations in our supply chain to comply with our values. Moorhouse expects its suppliers to operate in accordance with the UK Modern Slavery Act of 2015 and all internationally recognised human rights.

As a provider of professional services, Moorhouse does not have a substantial supply chain.

Our supplier relationships are primarily limited to:

- Smaller specialist consulting companies
- Suppliers of computer software and equipment
- Suppliers of office equipment, furnishings, and general maintenance



- Suppliers of catering services for meetings
- Suppliers of utilities
- Recruitment agencies
- Learning and development agencies and companies

Moorhouse uses reputable suppliers and agencies to source products and recruit individuals. The practices of any new supplier or agency are rigorously verified prior to being engaged by Moorhouse. The risk of modern slavery existing within our supply chain is therefore very low.

3. Due Diligence

We will continue to monitor risk levels throughout our supply chain and are prepared to take the appropriate action (i.e., cease contracts with suppliers) if the use of any practices of modern slavery are detected.

Moorhouse is committed to working with suppliers and customers who share our dedication for conducting business in a legal, ethical, and socially responsible manner, as reflected in our Supplier Code of Conduct.

Expleo has implemented a robust due diligence process to identify and mitigate risks of modern slavery within its business and supply chain. This is an external, managed platform which Moorhouse also utilises.

Due diligence is systematically performed to verify all new suppliers. When considering a new supplier, we request copies of their Code of Conduct and business policies and provide a copy of our Code of Conduct and Supplier Code of Conduct prior to utilisation of their services. We also monitor the business practices of our existing suppliers to ensure that we continue to meet our modern slavery commitments.

4. Awareness and Training

4.1 Training

Our onboarding approach includes a specific Modern Slavery Module which must be completed by all employees annually. Communications are also sent to all employees on an annual basis to remind them to remain vigilant for any signs of breaches of the Modern Slavery Act in their business activities. To ensure a high level of compliance, our employees are also educated on other policies, such as the Do-We-Bid process, and key pieces of legislation that support the prevention of modern slavery in our supply chain.

Within the business itself, each year we send out communications to all employees reminding them of the importance of remaining vigilant for any signs of breaches of the Modern Slavery Act in their client work. This is also posted on our internal company website The Hub and is available for all staff to read.

To ensure we stay up to date with the latest industry requirements, either the Moorhouse Lead Partner or Compliance Officer will undertake the following:

- Attendance of at least one Modern Slavery seminary every three years, e.g., Thomson Reuters, CPD, The Human Trafficking Institute
- Participate in industry forums, e.g., the Freedom from Slavery Forum, the



Human Trafficking Foundation, the PRI Forum (Principles of Responsible Investment)

- Subscription to industry communication channels, e.g., Compliance Insider

The learnings and outcomes from the above will be shared into the business to ensure our policies and procedures are kept as up to date as possible with the best, most current industry practices.

4.2 Whistleblowing

Moorhouse operates a whistle-blowing process to ensure our employees understand that they always have a place to call out malpractice and behaviour, whether within Moorhouse itself or a third party associated with Moorhouse, including client organisations or suppliers. It is built into our organisational culture and values that everyone has a duty of care and social responsibility to say and do something about any suspected issue.

5. Our Effectiveness

We are committed to ensuring that slavery and human trafficking practices are not taking place in any part of our business or supply chain. We will therefore, continue to measure the effectiveness of our processes and the actions in place to reduce the potential risk of slavery and human trafficking occurring. We will be completing quality audits, ensuring our due diligence process has been followed and this will be evidenced through a clear trail.

By exception we will respond in a timely manner to:

- Reports received from employees
- Reports received from the public
- Reports received from any policing or law enforcement agencies

6. Management approval

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Moorhouse Consulting Limited, effective 30th July 2024.



Joe McGarry, Partner

