

Modern slavery statement

This Modern Slavery Policy represents Morses Club PLC's (MCL) direction to the business on this topic.

This statement is made pursuant to section 54, Part 6 of the Modern Slavery Act 2015 and describes how MCL has taken steps and is continuing to take steps to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

MCL is a financial services business that employs over 500 people, including its subsidiary, Shelby Finance Limited. As a part of conducting business, MCL and its subsidiaries, have several supplier relationships, the majority of which are UK based.

MCL has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically and with integrity and transparency in all business dealings, putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the businesses and our supply chain.

Our Anti-slavery Policy reflects our commitment to act ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking taking place in our supply chains.

As part of our standard procurement process and to ensure compliance with our policy, MCL request that all suppliers are contractually obliged to respond to an annual audit questionnaire, providing evidence and documentation regarding their company processes and procedures.

During 2017 a supply chain risk assessment was completed on more than 100 suppliers. This process was based on information about the supplier including the industry sector and geographical location. The results produced a supplier risk rating that can be used to prioritise future due diligence. This is a continual process and a risk assessment is completed on all new suppliers. MCL does not have any suppliers within the MCL supply chain that have been identified as 'high risk'.

Annually, all suppliers are asked to confirm what steps they are taking to prevent Modern Slavery and to provide details of how they treat their employees in terms of wages, working hours and training, this is recorded and reported to the board in cases of non-compliance.

MCL takes a risk-based approach to our contracting processes and makes balanced decisions surrounding supplier selection to ensure compliance with the Act.

For both national and international supply chains, the point of contact is preferably with a UK company or subsidiary and MCL expect a suitable response from these entities on their antislavery and human trafficking policies and processes. MCL has systems in place to encourage the reporting of concerns and to protect whistle blowers.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, MCL provides training to relevant members of staff.

MCL continues to review its policies and processes with the full approval of the Board of Directors to ensure that the best approach is taken and to ensure high standards within our supply chains.

A handwritten signature in black ink, appearing to read 'Paul Smith', with a horizontal line drawn across the middle of the signature.

Paul Smith
Chief Executive Officer
Morses Club PLC

August 2021