

Modern Slavery Policy

Introduction

MCFT is fully committed to preventing modern slavery and human trafficking in all aspects of our operations and supply chains. This policy outlines our commitment to upholding the principles of the UK Modern Slavery Act 2015 and ensuring that modern slavery does not take place within our business or any of our supply chains.

Scope

This policy applies to all employees, contractors, suppliers, and any other business partners working with or on behalf of MCFT. We expect all individuals and entities involved in our operations to share our commitment to combating modern slavery and human trafficking.

Our Commitment

MCFT is dedicated to acting ethically and with integrity in all our business dealings. We have zero tolerance for modern slavery in any form, and we are committed to taking proactive steps to ensure that no form of forced labour, child labour, human trafficking, or other forms of modern slavery are present in our business or supply chain.

Our Supply Chain

We work with a wide range of suppliers and business partners across multiple industries. We recognise the importance of understanding the risks of modern slavery in our supply chain and are committed to:

- Conducting due diligence to identify and address any risks of modern slavery.
- Working with suppliers who share our values and commitment to eradicating modern slavery.
- Monitoring and assessing our suppliers to ensure compliance with this policy.

Risk Assessments and Due Diligence

We regularly assess the risks of modern slavery in our business and supply chains. This involves:

- Engaging with stakeholders to ensure that risks are properly identified and addressed.
- Implementing effective due diligence processes to prevent, detect, and respond to any instances of modern slavery.

Training and Awareness

We are committed to ensuring that all employees, contractors, and relevant stakeholders are aware of the risks of modern slavery and their responsibilities under this policy. This includes:

- Providing training on modern slavery to employees, especially those involved in recruitment, procurement, and supply chain management.
- Raising awareness of the signs of modern slavery and how to report concerns.

Reporting Concerns

We encourage all employees, suppliers, and other stakeholders to report any concerns related to modern slavery or human trafficking. Reports can be made through our confidential reporting channels and will be treated seriously and with discretion. We will thoroughly investigate any reports of modern slavery and take appropriate action, including notifying relevant authorities if necessary.

Responsibility

The UK Managing Director & Head of HR are responsible for implementing this policy and ensuring its effectiveness. The leadership team has overall responsibility for ensuring compliance with this policy and ensuring that sufficient resources are allocated to address the risks of modern slavery.

Review and Continuous Improvement

We are committed to continuously improving our practices to combat modern slavery. This policy will be reviewed annually and updated as necessary to reflect new legal requirements, business changes, or improvements in best practices.

Approval

It is the responsibility of the Senior Management Team to ensure full compliance of the company Modern Slavery Policy.



Signed:

Andrew Richman
UK Managing Director
March 2026

Associated Policies

This policy should be read in conjunction with the following company policies, which support our commitment to preventing modern slavery and promoting ethical working practices:

MCFTP005a/MCFTP005b – Disciplinary Policy
MCFTP008 – Recruitment Policy
MCFTP007 – Environmental, Social & Governance Policy
MCFTP015 – Whistleblowing & Fraud Policy