MODERN SLAVERY & HUMAN RIGHTS POLICY

Controlled company policy | MOG-POL-MSHR-001 | Revision 0 | 18 October 2026

1. Purpose and commitment

Mogas Design Ltd prohibits modern slavery, forced or compulsory labour, human trafficking, debt bondage, child labour, inhumane treatment and human rights abuse. Everyone supplying services to or on behalf of Mogas must be treated with dignity, fairness and respect. The directors will take proportionate steps to identify, prevent and address risks in the company and its supply chain.

2. Scope and structure

Applies to both directors, independent freelance engineers, self-employed contractors, personal-service companies and relevant suppliers, including overseas suppliers. Mogas operates principally as a remote engineering design consultancy with occasional visits to client-controlled gas infrastructure sites; it does not directly employ a salaried workforce. Contractors retain their own legal obligations.

3. Human rights and labour standards

Do not tolerate coercion, threats, retention of passports or identity documents, recruitment fees charged to workers, unlawful restrictions on movement, trafficking, discrimination, harassment, bullying, violence or degrading treatment. Working arrangements must be voluntary, with legal entitlement to work, lawful pay, agreed terms, safe work and freedom to raise concerns. Respect lawful freedom of association and privacy.

4. Supplier and contractor due diligence

Apply risk-based checks before appointment and periodically where appropriate: verify business identity, scope, competence, contractual arrangements and apparent legitimacy; assess location, subcontracting chains, payment arrangements and any credible labour-abuse indicators. Give enhanced attention to overseas outsourcing, agency labour and opaque subcontracting. Do not claim audits, certifications or verification that have not occurred.

5. Engineering and site conduct

Require contractors to observe client site rules, the Mogas Code of Conduct and site-specific RAMS for every gas-site visit. Never compel an individual to undertake unsafe work, work beyond competence or work under threat. Escalate coercion or exploitation observed on site to the client dutyholder and relevant authorities as appropriate.

6. Warning signs and response

Warning signs may include fear of speaking freely, withheld wages, excessive hours, controlling supervisors, confiscated identification, suspicious deductions or unsafe accommodation. If immediate danger exists, contact emergency services (999). Do not confront a suspected exploiter or put an affected person at risk. Preserve relevant records and promptly alert a director or appropriate external authority.

7. Speak up, investigation and protection

Anyone may raise concerns confidentially with either director, including anonymously where practicable. Where a director is implicated or an internal report is unsafe, use an appropriate external regulator, police, client safeguarding channel or independent legal advice. Reports will be acknowledged where contact is available, assessed impartially, investigated proportionately and recorded securely. Retaliation or victimisation is prohibited. Statutory whistleblowing protection depends on applicable legal tests and worker status.

8. Corrective action and remediation

Where concerns are substantiated, act to protect affected people, halt unsafe or abusive arrangements, cooperate with competent authorities, address root causes and monitor remediation. Termination of a supplier is not automatically the safest response; consider the welfare of potentially exploited workers and specialist advice.

9. Legal framework and transparency

Relevant UK law includes the Modern Slavery Act 2015, Human Rights Act 1998, Equality Act 2010 and applicable employment, immigration, health and safety and data protection law. Under section 54 of the Modern Slavery Act, the annual slavery and human trafficking statement duty ordinarily applies to qualifying commercial organisations with total turnover of at least £36 million. Mogas does not claim this mandatory publication duty applies at its current small-company scale; this voluntary policy records its commitments.

10. Records, awareness and review

Maintain proportionate supplier screening, contractual commitments, concern reports and corrective-action records in restricted company cloud storage. Inform relevant contractors of this policy and the Speak Up and Whistleblowing Policy. Directors review the policy annually or after a material incident, legislative change or operational expansion.

Document control and director approval

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Director	Mohammed Fasiuddin
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Director signature:

Signed copy held on file – available on request.