

Anti-Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and is made on behalf of Midwich Group plc ('Midwich'), which is incorporated in, or carries out, business in the UK, and covers the financial year ended 31 December 2016. Midwich is fully committed to supporting the aims of the legislation. This statement sets out the steps that Midwich has taken, is continuing to take and will take to ensure that modern slavery / human trafficking is not taking place within its business or its supply chain.

Introduction

Slavery and / or human trafficking (Modern Slavery) is a global issue and one that continues to grow given the rapid rise in global migration. It can exist in every region of the world and in every type of economy and therefore no sector or industry can be considered immune or untainted.

Midwich operates a zero-tolerance approach to any form of Modern Slavery and commits to act ethically, with integrity and transparency in all business dealings at all times. We aim to implement and maintain effective systems and controls to identify and erase any form of Modern Slavery taking place within the business and/or our supply chain.

Our business and supply chain structure

Established in 1979, Midwich is a specialist audio visual (AV), professional video, film, broadcast, lighting and document solutions distributor to the trade markets, operating across ten countries, being the UK, Ireland, France, Germany, Spain, Portugal, the Netherlands, Belgium, Australia and New Zealand.

Midwich's 600+ strong team operating out of 19 offices, is dedicated to continually enhancing our technical expertise, building extensive product knowledge and delivering strong customer service. We have a large and diverse base of approximately 10,000 customers and long-standing relationships with over 300 vendors, including blue-chip organisations, making our supply chain extensive and global.

The Group supports a comprehensive product portfolio across major technology categories such as large format displays, projectors, digital signage and document solutions.

Our policies and control

Midwich employees have a responsibility to be alert to the risks of Modern Slavery, however small, within both our business and the wider supply chain. They will be expected to report any concerns, using the appropriate reporting channels, and management will be expected to act upon them.

Midwich will only deal with reputable trade suppliers and will not conduct business with companies that we know engage in practices prohibited by the Modern Slavery Act. We expect our suppliers to demonstrate a zero-tolerance approach to exploitation. We will treat any breach of Modern Slavery very seriously and any Midwich employee who is found to breach the ethical principles of the Act will face disciplinary action, which could result in dismissal for gross misconduct.

Our suppliers

We understand that the biggest area of risk for exposure to Modern Slavery rests in our product supply chains. We conduct due diligence on suppliers before allowing them to become a preferred supplier through the form of credit and risk checks. Our Modern Slavery policy will form part of our agreements with all new suppliers and they will be required to confirm that no part of their business operations contradicts this policy.

Many of our suppliers are members of the Electronic Industry Citizenship Coalition (“EICC”) and/or have adopted the EICC Code of Conduct, which prohibits forced, bonded or indentured labour, involuntary prison labour, slavery or trafficking of persons and requires minimum standards in terms of working conditions.

As part of our contractual negotiations with new suppliers, and re negotiations with existing suppliers, we will require their confirmation that:

1. They have, or are actively taking steps to identify and / or eradicate Slavery within their business and supply chain;
2. They hold their own suppliers to account over Slavery;
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

Our continued commitment

We adopt a positive and responsible attitude towards continued compliance to prevent Modern Slavery and look for ways in which we can improve as a business. Key success factors will include (but not be limited to):

1. **Anti-Slavery policy.** We will introduce a policy which will further enhance this statement by setting out Midwich’s stance on Modern Slavery and explain how employees can identify any instances of this and where they can go for help.
2. **Amended Contractual Agreements.** We will amend our standard supplier contractual terms to ensure our suppliers are aware of, and are actively complying with, or working towards compliance with the provisions of the act. The terms would seek to grant us the right to terminate the contract in the event of their failure to comply.
3. **Enhanced due diligence.** We will carry out an online search of suppliers (potential and existing) who fall within the realms of the Act, to ensure compliance and that there are no current cases of conviction for Modern Slavery. In addition, we will also write to and where possible offer assistance to, any of our top suppliers that do not have their own Modern Slavery statements to ensure they are fully compliant.
4. **Ongoing Training** - Key staff will be provided training, ensuring they can identify signs of Modern Slavery and their responsibilities if they suspect that it is taking place within our supply chain. We will extend this training out so that we have a dedicated space within our corporate induction programme, ensuring all new joiners are captured in the learning.
5. **Recruitment policy.** We will continue to operate a robust recruitment policy that includes conducting checks on potential employees’ eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
6. **Whistleblowing policy.** We will continue to operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. This also extends and is available to others working in our supply chains, which encourages staff to report any wrongdoing. All reports will be fully investigated and appropriate remedial action(s) will be taken.

Key performance indicators

We will be confident in the effectiveness of the steps that we are taking to ensure that Modern Slavery is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that Modern Slavery practices have been identified.

Approval for this statement

This statement is approved by the Board of Directors:

A handwritten signature in black ink that reads "Stephen Fenby". The signature is written in a cursive, flowing style.

Stephen Fenby
Group Managing Director, Midwich Group plc
September 2017