

Anti-Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 ('Act') and is made on behalf of Midwich Group plc ('Midwich'), which is incorporated in, and, through its subsidiaries ('Group'), carries out business in the UK and overseas. This statement covers the financial year ended 31 December 2017. 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 continues to operate 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 have implemented and continue to maintain effective systems and controls, which support us in ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

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.

The Group's 800+ strong team operating out of 23 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 has implemented the Modern Slavery and Human Trafficking Policy ('Policy') which applies to all persons working for Midwich, on our behalf or with us in any capacity.

Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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 are expected to report any concerns, using the appropriate reporting channels, and management are expected to act upon them. Midwich, through its Whistleblowing Policy, ensures that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form, is, or may be taking place in any part of our own business or in any of our supply chains.

Midwich's subsidiaries, both in the UK and worldwide, either adhere to their own policies, which address Modern Slavery or comply with the principals of this statement.

Our suppliers

Midwich 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 and Human Trafficking Policy will form part of any agreements with all new suppliers and they will be required to confirm that no part of their business operations contradicts this Policy.

Our continued commitment

We have adopted 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. **Modern Slavery and Human Trafficking Policy.** We have introduced 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. **Contractual Agreements.** We have been amending our current 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 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** - All staff are required to undertake Modern Slavery training, ensuring they can identify signs of Modern Slavery and their responsibilities if they suspect that it is taking place within our supply chain. This training also forms part of our corporate induction programme, ensuring all new joiners are captured in the learning.
5. **Recruitment policy.** We 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 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 are fully investigated and appropriate remedial action(s) is taken.

Key performance indicators

We are 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:

Stephen Fenby

Group Managing Director, Midwich Group plc

August 2018