

Midwich Group Plc

MIDWICH GROUP PLC - SLAVERY AND HUMAN TRAFFICKING STATEMENT

Midwich Group Plc supports the objectives of the Modern Slavery Act 2015 (“the Act”) of eliminating slavery and human trafficking and makes this statement pursuant to section 54(1) of the Act for the financial year ended 31 December 2018.

INTRODUCTION

Midwich Group plc is the ultimate parent company of a group of companies which specialise in audio visual distribution to the trade market. It employs over 900 employees in 24 offices with operations across the UK and Ireland, Continental Europe and Asia-Pacific. That group of companies is hereafter referred to as the “Group” or “Midwich”). Midwich enjoys long-standing relationships with over 400 world-wide, well-known manufacturers and a large and diverse base of resellers.

The Act requires commercial organisations to publish a statement as to the actions they have taken to detect and deal with acts of modern slavery in their businesses and supply chains. This obligation applies to organisations that carry on business in the UK and which have a total annual turnover in excess of £36 million. This statement is therefore made by Midwich Group Plc and each of its subsidiaries that are required to make such a statement in accordance with the Act. The statement is also made on behalf of certain other subsidiaries of the Group (both UK and non-UK) that, while not subject to the requirements of the Act, recognise the importance of a Group-wide approach to improving transparency and preventing slavery and human trafficking occurring within its supply chain. The companies making this statement are listed below.

COMMITMENT

The Group acknowledges its responsibilities under the Act and is committed to preventing slavery and human trafficking within its own businesses and in its supply chain. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

The Group has a zero-tolerance policy towards modern slavery. It will refrain from entering into business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment.

The Group offers employment contracts on a guaranteed hours basis only; no offers of employment are made on a zero hours basis.

Part-time and fixed-term employees within the Group are generally provided with the same pro-rata contractual entitlements as full-time and permanent employees. If these are not offered, the Group is able to rely on objectively justifiable grounds.

POTENTIAL EXPOSURE

The Group considers its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

In the operation of its business, the Group's main supply chains are those related to the provision of services. The Group considers its main exposure to the risk of slavery and human trafficking to exist in product supply chains.

STEPS

The Group implemented the Modern Slavery and Human Trafficking Policy (the "Policy") which applies to all persons working for, on its behalf or with it in any capacity. The Policy reflects Group's commitment to acting ethically and with integrity in business relationships and to implementing and enforcing effective systems and controls.

Midwich conducts due diligence on suppliers, through credit and risk checks, before allowing them to become a preferred supplier. Midwich carries 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. The Policy, or adequate contractual arrangements, form part of any agreements with all new suppliers.

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.

As part of an induction process, employees are made aware of the Group's Policy and other policies relating to standards of behaviour that it requires from them. Each employee must review, familiarise and complete the Modern Slavery and Human Trafficking training.

Group's employees have a responsibility to be alert to the risks of modern slavery, however small, within both its 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. The Group, 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.

GROUP'S LEGAL, REGULATORY AND RISK COMMITTEE

The Group operates a Legal, Regulatory and Risk Committee, which oversees the Group's compliance with, among other things, the Policy. The Group Head of Legal and Compliance chairs the Committee and is the nominated individual to whom all concerns regarding modern slavery should be addressed.

We will continue to monitor the Group's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place in the Group's supply chain and/or businesses.

Since the publication of the previous statement, there have been no reports that any of the Group's suppliers have been involved in activities covered by the Modern Slavery Act.

This statement is made on behalf of Midwich Group Plc and the following subsidiaries: Midwich Limited, Invision UK Limited, Holdan Limited, Sound Technology Limited, Square One Distribution Limited, Prase Engineering S.p.A., Midwich Australia Pty Limited, Sidev SAS, Sound Directions France SAS, Kern & Stelly Medientechnik GmbH, Earpro S.A., Gebroeders van Domburg B.V., Holdan Benelux B.V., Blonde Robot Pty Limited, Midwich Limited (NZ), Bauer & Trummer GmbH, MobilePro AG, AV Partner AS, Midwich Asia Pte Ltd and Blonde Robot Pty Ltd.

Approval for this statement

This statement is approved by the Board of Directors:

Stephen Lamb
Group Finance Director and Company Secretary
Midwich Group plc
June 2019