



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 2020.

INTRODUCTION

The Act requires commercial organisations to publish a statement as to the actions they have been 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.

ORGANISATION’S STRUCTURE, BUSINESS AND SUPPLY CHAIN

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 1,000 employees across the UK and Ireland, EMEA, Asia-Pacific and North America. That group of companies is hereafter referred to as the “Group” or “Midwich”.

Midwich is a trade only distributor which means it will acquire AV products from the manufacturers and then sell to AV integrators and IT resellers. These AV integrators and IT resellers then sell on to the end users which cover the corporate, events, government, education, retail, hospitality, healthcare and residential markets. Midwich enjoys long-standing relationships with over 500 world-wide, well-known manufacturers and a large and diverse base of resellers.

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 be involved 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 law.

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.

POLICIES

The Group has 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 the Group’s commitment to acting ethically and with integrity in business relationships and to implementing and enforcing effective systems and controls, which is an extension of its Group wide values.

In line with the above, Midwich has a whistleblowing policy where employees can report concerns, suspicions or knowledge of misconduct or unethical behaviour in a secure and structured way.

EXPOSURES, RISK ASSESSMENT AND DUE DILIGENCE

The Group considers its exposure to modern slavery to be limited and mainly relates to the working conditions and treatment of employees in the product supply chain, especially in higher risk countries. 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.

Each year, the Group will monitor its 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. This includes an annual review of the largest suppliers and customers to understand the information that they publish publicly on their websites.

The Group operates a Risk Committee, which oversees the Group’s compliance with, among other things, the Policy. The Group Head of Tax, Treasury, Compliance chairs the Committee and is the nominated individual to whom all concerns regarding modern slavery should be addressed. Given the circumstances surrounding Covid-19, the formal risk committee meetings were temporarily put on hold but a process to flag any immediate concerns was put in place. Risk Committee reviews have restarted in 2021. The Group annually reviews its operational compliance, and Modern Slavery forms part of that review, through the risk registers and information gathering.

Midwich conducts due diligence on suppliers, through credit and risk assessment, 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 Modern Slavery 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 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.

TRAINING

The 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 required to report any concerns, using the appropriate reporting channels, and management are obliged 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.

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 confirm that they have understood the Policy.

Suitable ongoing training is delivered on Modern Slavery and Human Trafficking to the relevant teams in the Group which is managed through a third party platform.

PROPOSED ACTIONS FOR THE NEXT FINANCIAL YEAR:

1. Major suppliers to complete self-assessment questionnaire to check ongoing compliance.
2. Mandatory training for new starters on Modern Slavery
3. Refresher training for all employees dealing who have relationships with suppliers
4. Ensure that Modern Slavery continues to be a core item of the Group's overall Environmental, Social Governance framework

This statement is made on behalf of Midwich Group Plc and the following UK subsidiaries: Midwich Limited, Invision UK Limited, Holdan Limited and Sound Technology Limited.

The Midwich Group's overseas subsidiaries, 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 and as such in the process of aligning with their own internal processes and procedures with the statement.

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 2021