

*The UK's Modern Slavery Act ("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 UK subsidiaries that are required to make such a statement in accordance with the Act.*

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*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 2023.*

## **ABOUT US**

Midwich is a trade only distributor which means it acquires AV products from manufacturers and which it then sells to customers including AV integrators and IT resellers. These AV integrators and IT resellers then sell on to the end users operating in the corporate, events, government, education, retail, hospitality, healthcare, and residential markets. Midwich enjoys long-standing relationships with over 800 world-wide, well-known manufacturers and a large and diverse base of resellers.

Midwich Group plc is headquartered in Norfolk, England and is the ultimate parent company of a group of companies which specialise in audio visual distribution to the trade market. For the purposes of this statement, the UK companies covered by this statement are hereafter referred to as the “Group” or “Midwich”.

We operate in the UK and Ireland, Europe, Middle East, Asia-Pacific and North America, with approximately 1,900 employees.

## **OUR COMMITMENT**

The Group:

- acknowledges its responsibilities under the Act and is fully committed to preventing slavery and human trafficking within its own businesses and in its supply chain,
- understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains,
- has a zero-tolerance policy towards Modern Slavery. It will refrain from entering 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.

## **EXPOSURES AND RISKS**

As the goods sold by the Group have already been manufactured by the time they pass into our ownership, 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. The Group works with its supply chain to endeavour that such practices do not take place in the business of any organisation that supplies goods and/or services to it. The Group conducts surveys every 2-3 years of its key vendors to ensure compliance Modern Slavery requirements, In addition, the Group monitors 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.

## **LABOUR PRACTICES**

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK to safeguard employees and apprentices from any abuse or coercion.

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.

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.

## **OUR BUSINESS RELATIONSHIPS**

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 Act.

In the event that any of our suppliers were to be found to have been involved with Modern Slavery, the majority of our contracts allow us to terminate for convenience where it is found to have been a breach of the Act. If a specific clause is not included, we would then look to exit the contract in the most appropriate manner possible.

## **RISK ASSESSMENT AND DUE DILIGENCE**

### Annual Review

The Group conducts an annual review of the largest suppliers and customers to understand the information that they publish publicly on their websites and asks key suppliers to complete Modern Slavery questionnaires at regular intervals.

### Operational Compliance

The Group annually reviews its operational compliance, and Modern Slavery forms part of that review, through the risk registers and information gathering.

The Group Head of Tax, Treasury, Compliance has regular updates with the nominated individuals across the Group to discuss how Modern Slavery risks and concerns should be addressed.

## Due Diligence

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 Act, to ensure compliance and that there are no current cases of conviction for Modern Slavery. The Group aim to have adequate contractual arrangements in respect of Modern Slavery with all new suppliers.

## **POLICIES AND RESPONSIBILITY**

### 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.

### Responsibility

The board of directors have overall responsibility for ensuring the Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Group Compliance team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **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.

Since 2022, the induction process in the UK also includes detailed training courses on Modern Slavery and Whistleblowing. The courses include attestations for employees to agree that they understood the training and the topics included. This ensures employees have a good understanding of Modern Slavery and the risks it poses to our group from the very beginning of their Midwich Group career, as well as the options available via under the Whistleblowing legislation should they ever be required. Training on these topics was also rolled out to all current UK staff.

In the year ended 31 December 2023 the following actions took place:

- Training on Modern Slavery started to be rolled out across EMEA region
- Continued focus on Modern Slavery as part of the Group's overall Environmental, Social and Governance framework

Further actions are planned in the year ending 31 December 2024:

- Implement Modern Slavery statements in Canada and Norway
- Detailed survey of key vendors
- Continue roll out of Modern Slavery training in EMEA
- Continue to work with vendors to understand their supply chain
- Revise any contractual clauses (if required)

This statement is made on behalf of Midwich Group Plc and the following UK subsidiaries: Midwich Limited, Holdan Limited, Midwich International Limited, Sound Technology Limited, Nimans Limited, Network Sales & Solutions Limited, Yealink (UK) Limited, Cooper Projects Limited and DVS Limited, Pulse Cinemas Limited, Pulse Cinemas Holdings Limited, H H B Communications Holdings Limited, H H B Communications Limited and H H B Limited for the year ended 31 December 2023. All of the UK subsidiaries are 100% owned by Midwich Group plc (either directly or indirectly) apart from Midwich International Limited which is 80% owned and Cooper Projects Limited & DVS Limited which are owned 66%.

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. Exposure across the wider group is limited as there is a substantial overlap between the UK vendors and those used by the rest of the group and broad alignment in operational procedures between businesses.

Approval for this statement

This statement is approved by the Board of Directors:



Stephen Lamb  
Group Finance Director and Company Secretary  
Midwich Group plc  
May 2024