

## **MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement for Midland Communications Co Ltd (Midland) for the financial year ending December 31, 2017.

Midland is committed to ensuring that we conduct our business in a way that supports the prevention of modern slavery and human trafficking, including through our supply chain. We strive to ensure that our business and supply chain reflect our values, which include the respect for human rights and a belief that everyone should be treated with dignity and respect. We continuously aim to improve our practices to combat modern slavery and human trafficking and to work with and encourage our suppliers to uphold these principles. More specifically:

- Midland has a Code of Business Conduct and a Global Ethics and Compliance Hot line. Our Code of Business Conduct establishes ethical business conduct as critical to our business and our expectation of compliance with applicable laws. It enables and encourages employees to escalate any violations of which they become aware. Regular training is provided to all Midland employees to reinforce these principles and expectations and the awareness of our Code of Business Conduct in general.
- While all Midland employees are required to respect the principles on human rights and labour standards pursuant to our Code of Business Conduct, we additionally would not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour or that would otherwise refuse to comply with the requirements at stake.
- Our main manufacturing suppliers are all members of the Electronics Industry Citizen Coalition (the "EICC") and, as such, have agreed to follow the EICC Code of Conduct. The EICC Code of Conduct establishes standards to ensure that working conditions in the electronics industry supply chain are safe, that workers are treated with respect and dignity and that business operations are conducted ethically.

No incident related to forced labour or human trafficking in the organisation or supply chain was identified by Midland in 2017.



Signed on behalf of Midland Communications Co Ltd by:

*David Webster*

*Director – MidLand Communications Co Ltd*

Approved on 19 February 2018.

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