

# MODERN SLAVERY STATEMENT

## DOCUMENT SUMMARY:

This is an MTI Statement that is made pursuant to section 54(1) of the Modern Slavery Act and constitutes MTI Technology Limited's slavery and human trafficking statement.

## Document Control Details

### DOCUMENT USAGE

Paper copies are not controlled.

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### REVISION AND REVIEW HISTORY

#### Amendment record

Issue Status	Version	Date	Actioned By	Description
PRE DRAFT	1.0	07/06/2016	S Cournoyer	Initial discussion
DRAFT	1.0	11/10/2016	R Firth	Initial draft for consultation
LIVE	1.0	12/10/2016	R Firth / K Clark	Reviewed and minor amendments made, final legal review
LIVE	1.0	12/10/2016	B Firth	Released to website & NETconsent
LIVE	1.0	09/08/2017	B Firth	Annual review – new branding applied, signed by Scott Haddow
LIVE	1.0	12/12/2017	B Firth	Annual review – No updates
LIVE	1.1	30/01/2018	B Firth	Annual review – No Updates
LIVE	2.0	31/09/2019	L Rush	Annual review – New Branding and minor amendments made

### DOCUMENT DISTRIBUTION

Name	Title	Contact	Role
Ben Cranham	Chief Operating Officer	01483 520200	Owner

### CONFIDENTIALITY STATEMENT

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## 1.0 ORGANISATION STRUCTURE AND SUPPLY CHAIN

This statement is made pursuant to section 54(1) of the Modern Slavery Act (the "Act") and constitutes MTI Technology Limited's slavery and human trafficking statement for the financial year ending 31st March 2019.

MTI Technology Limited is a limited liability company registered in Scotland (registered number SC112019) and is part of MTI Technology Group Limited.

As a global IT goods, solutions and services provider, we are committed to the highest professional standards and work with clients worldwide, helping them to secure, protect, and manage every aspect of their IT environment. Our Supply chains are extensive and global including a wide variety of suppliers and subcontractors who provide IT goods and services.

## 2.0 OUR POLICY ON MODERN SLAVERY

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Corporate and Social Responsibility and Equal Opportunities Policies 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.

We also operate a Grievance Policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated, and appropriate remedial actions taken.

We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Sales Directors are accountable for ensuring that their Sales Teams are aware of and follow this Statement.

## 3.0 DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The organisation currently operates in the following countries/regions:

- United Kingdom
- France
- Germany
- Italy
- USA
- Ireland
- Norway
- Sweden
- Belgium
- Netherlands
- Australia
- China
- Switzerland

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistle blowers.

## 4.0 RISK ASSESSMENT AND SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To help identify and monitor the risk of slavery and human trafficking in our supply chain our procurement process includes vetting suppliers and sub-contractors to ensure that they are committed to ethical labor practices. We include anti-slavery and human tracking provisions in all our contracts with suppliers. We require each organisation in our supply chain to undertake reasonable checks to ensure that their own suppliers meet the same standard.

Every new supplier and all our suppliers are expected to comply with all local and national laws and regulations, and we will not support or deal with any business knowingly involved in slavery or human trafficking.

## 5.0 OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following performance indicators to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The number of suppliers and sub-contractors vetted for ethical labor practices;
- The number of inspections of direct suppliers and sub-contractors in our supply chains in the past year;
- The number of reported breaches in the past year; and
- The number of employees that will be receiving or already have received training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.

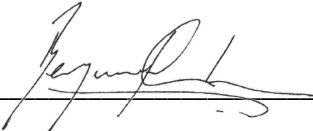
We are constantly reviewing our procurement process and the level of management control required for these supply sources will be continually monitored.

## 6.0 EMPLOYEE TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, MTI will be implementing training to our employees. This Statement is also shared with all employees internally to be read and understood. We also require our suppliers and sub-contractors to provide training to their employees and ensure that their own suppliers and providers do the same.

This policy statement will be reviewed annually and published on the MTI website & shared with all MTI employees via our HR platform.

This Statement was approved by the Board of MTI Technology Limited on the date below:

SIGNED  DATE 30 September 2019

PRINTED Ben Cranham POSITION Chief Operating Officer