



Modern Slavery Transparency Statement

This policy is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 (MSA) and has been endorsed by the Board of Directors M-Integrated Solutions PLC (M).

M does not tolerate any form of modern slavery or human trafficking in any part of our business and we are committed to carrying out our business in a manner which respects the rights of individuals in the communities in which we operate. We have taken, and are continuing to take, steps to ensure that our operations identify risk areas in their supply chains, and to implement policies and procedures to eliminate those risks.

We are members of [Sedex](#), a global membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. We and our fellow members form a global community of leaders who want to make it simpler to do business that's good for everyone.

The M Board of Directors are responsible for the overall strategic direction of the business including ensuring that systems of identification and management of risk, including the risk of slavery and human trafficking in our business or supply chain, are robust and appropriate

Our [Responsible Business Code](#), [Staff Handbook](#) and other policies aim to support and uphold the United Nations' Guiding Principles on Business and Human Rights.

Our Approach

Our work ranges from collection and analysis of data through to the creation of ideas and concepts, people and product promotion, and event delivery and coordination

Notwithstanding the diverse nature of the services offered by our agency and the significant number of individuals involved in delivering those services, M continues to consider our business low risk for modern slavery and human trafficking issues, as M has comprehensive employment policies and practices which minimise the risk of modern slavery. Whilst we engage with a broad range of suppliers worldwide we do not consider our supply chain to be high risk for reasons set out below.

Monitoring and Review

We have assessed our supply base with a view to identifying high risk suppliers or areas for focus. This assessment included mapping by category, spend and geography.

Suppliers used by M were identified as typically falling within the following categories: professional services, logistics delivery, venue hospitality, security services, transport and travel, cleaners and maintenance. Goods that we purchase include items such as raw materials, merchandise, utilities and general office equipment.

Overall, the risk assessment demonstrated that the majority of our suppliers are in low-risk countries.

Our Process

We conduct due diligence on all our suppliers above a minimum threshold. The due diligence process includes conducting searches using a leading compliance tool, **SMETA**, which enables us to access data from a wide variety of data points on companies around the world. Once a supplier has been accepted we continue to monitor for any change that may be notified through the **SMETA** compliance tool.

In 2018 we implemented a new Enterprise Resource Planning system, **Paprika**, which enables us to scrutinise expenditure in an efficient and consistent manner. This means we can have greater confidence in our data and the information we hold on our suppliers and supply chain.

We have also enhanced **M-Engage**, our interactive and accessible intranet which enables us to share information and to communicate more effectively with our staff wherever they may be.

Whilst we are confident there is limited risk in our primary tier suppliers we acknowledge there is still work to be done to understand risks further down the supply chain.

Using our new and refreshed systems we continue to take steps to focus on a number of areas where we deem risks may be higher (principally where we operate in geographies where our knowledge of, and relationship with, our suppliers is less deeply embedded).

We continue to focus on ensuring that our processes are robust, systematic, and assess the risk of modern slavery within our supply chain. Training and ensuring the application of consistent, high standards remain a priority.

Moral Maps

In addition to the above, we maintain a third party-managed whistleblowing portal, **Moral Maps**, to which all employees have access, should they feel they cannot raise their concerns internally.

In our periodic reminders to staff we include the reporting of concerns in relation to supply chain management (including those relating to slavery and human trafficking).

Due Diligence Processes Regarding Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we conduct due diligence prior to engaging with a vendor. The level and content of the due diligence depends on the vendor's risk profile and proposed activities. Our internal due diligence process includes completion and assessment of a compliance and litigation questionnaire. "High-risk" vendors are screened by an external party, reporting on litigation, adverse media and similar.

We perform periodic risk-oriented due diligence updates on vendors based on perceived risk and on the type or category of the products and services that we obtain. These will be assessed against published modern slavery indexes and country specific risk analysis made available to the public by dedicated reputable organisations.

Vendors identified as high-risk with respect to human rights and modern slavery will be subject to specific and more frequent assessment.

Corporate Compliance Committee

Our Corporate Compliance Committee will assess any actual or suspected offence in connection with modern slavery and determine specific remedial actions. The Committee consists of the Managing Director, Board Director/s, the Head of Finance and Head of HR and Organisational Development.

We have in place systems to enable and protect whistleblowers, which complement and strengthen our anti-slavery due diligence and monitoring processes.

Adherence to Our Values and Ethics

To ensure all those in our supply chain comply with our values we have included specific human rights and anti-modern slavery-related provisions in all our relevant vendor contracts, and compliance audits.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide general training to our staff. More targeted guidance will be delivered to the teams liaising more closely with relevant vendors, in order to provide them with specific tools and methods to combat and identify any potential situations of modern slavery.

Our Continued Commitment

As a company operating with strong commitment to high legal and ethical standards, we will continue to assess our business at regular intervals. Any issues identified will be addressed promptly, and we are committed to combating the use of any form of modern slavery at all levels of our supply chains.

This statement applies to the financial year ending 31 December 2018.

Last Reviewed on: 23 September 2019

A handwritten signature in black ink, appearing to read 'Jim Curley', with a long, sweeping underline that extends to the right.

Jim Curley
Managing Director