

Modern slavery and human trafficking statement 2019

INTRODUCTION

This statement sets out Midas Group Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2019.

Being part of the construction industry, Midas recognises that it has a responsibility to take a robust approach to slavery and human trafficking, both within our directly employed workforce or any of our supply chain.

Midas is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Midas Group Ltd currently operates solely in the UK, and provides construction and general property services to both public and private sectors, including the delivery of new build construction, refurbishment and planned maintenance services.

Policy

Ian Bassett, Business Support Director is responsible for putting in place and reviewing policies and the process by which they were developed.

RELEVANT POLICIES

Midas operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. All policies are reviewed at least annually

Whistleblowing policy

Midas encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise them under the protocols of this policy.

Disciplinary policy and Bullying and Harassment policy

The company's code makes clear to employees the actions and behaviour expected of them when representing Midas. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

Recruitment policy

Midas Group recruitment processes are transparent and reviewed on a regular basis. Only specified, reputable employment agencies are used to source labour. We always verify the practices of any new agency we utilise before accepting workers from that agency.

Midas Group undergoes a robust and diligent selection process in the selection of these agencies, including evidencing the agencies policies in the area of Modern Slavery and Traffic.

Part of this selection process will require agency partners to demonstrate steps taken to ensure slavery and trafficking is not taking part in any part of their business.

Midas Group preferred suppliers of labour are reviewed on an annual basis, normally in January of each year.

SUPPLY CHAIN

The company is committed to ensuring that its suppliers adhere to the highest standards of ethics, and that all supply chain partners have completed our rigorous pre-qualification and approval processes in this regard.

Part of this process will require supply chain partners to demonstrate steps taken to ensure slavery and trafficking is not taking part in any part of their business.

Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Midas works with suppliers, within the period of selection, pre-construction and onsite activities to ensure that they meet the standards of the code and improve their worker's working conditions.

However, serious violations of the company's supplier code of conduct, and formal sub- contract will lead to the termination of the business relationship.

DUE DILIGENCE

Midas Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- creating an annual risk profile for suppliers;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan including the termination of the business relationship

TRAINING

The organisation will arrange, where required, for all relevant staff involved in the procurement of supply chain partners within the organisation to complete training on modern slavery and trafficking during 2018/19.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation will raise further awareness of modern slavery issues by distributing flyers/putting up posters across the organisation's

premises, including information within the standard induction of all new starters, as well as on the company intranet.

The communication materials will explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking; and
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation

This policy applies to Midas Group Limited and all of its subsidiary and associated companies including Midas Construction Limited, Midas Retail Limited, Midas Commercial Developments Limited, Midas Property Services (UK) Limited and Mi-space (UK) Limited.

As a commitment to continuous improvement of all Midas Group policies, this policy will be reviewed periodically to ensure it remains in line with company objectives and compliant with legislation.

A handwritten signature in blue ink, appearing to read "Ian Bassett".

Ian Bassett

Business Support Director

March 2019