

mi hub

modern slavery statement

mi hub modern slavery statement . July 2021



Our statement has been written and published in accordance with the Modern Slavery Act 2015. It details our reflection, approach and strategy in relation to modern slavery for financial year ending July 2021 and outlines our commitments to mitigate the risk of modern slavery occurring in our business and supply chain in the coming year.

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Introduction

The Executive Leadership Team at Measured Identity Hub Ltd recognise that the health, safety and welfare of all employees, external stakeholders and the wider community who may be affected by its operations is of primary importance in the successful conduct of its business.

We consider modern slavery to be a crime of great seriousness, not only in the UK, but also on a global scale. The crime is committed by exploiting a victim for someone else's gain. It can take many forms including debt bondage, criminal exploitation, sexual exploitation, labour exploitation, domestic servitude, organ harvesting and human trafficking.

As a business with increasing international presence, we look to not only adhere to and appreciate the standard of accountability set by the UK Government in the form of the Modern Slavery Act 2015, but also demonstrate our commitment to affect change within our global business and with our global partners.

Organisation Structure

We have offices in the UK, Europe, Bangladesh and the US and are an international supplier of corporate clothing and uniform solutions to businesses and individuals, trading through our Dimensions, Affinity, Yaffy and Alexandra brands.

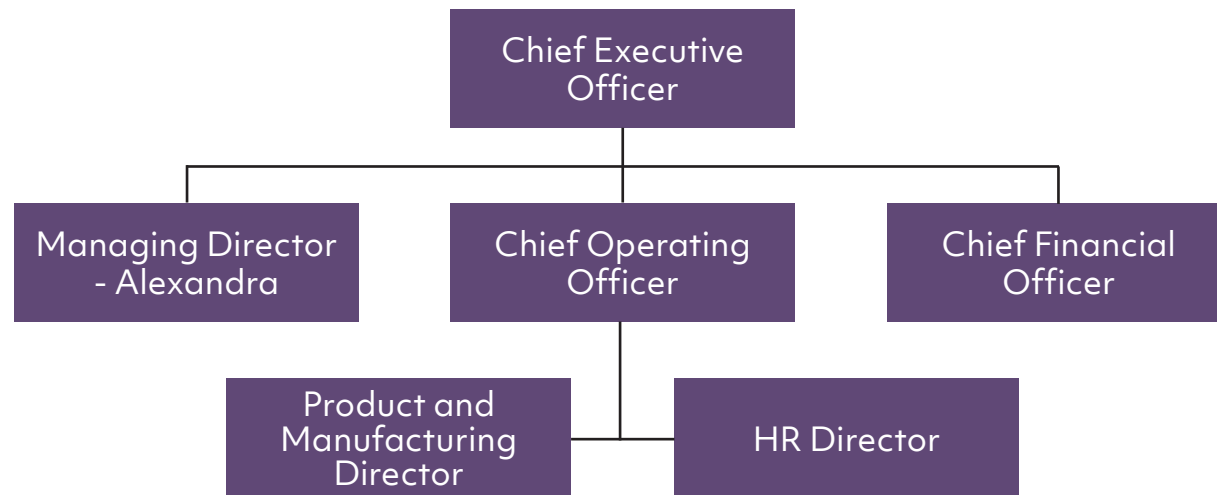
 <p>UK market leader in corporate clothing</p>	 <p>One of the largest US experts in corporate clothing</p>	 <p>A leading supplier in high performance outdoor and technical clothing</p>	 <p>A workwear supplier for over 150 years</p>
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- The group turnover for 2021 is c £204m
- Employs more than 800 people across its offices in the UK, Europe and the US.
- Dispatched over 23 million garments in 2020.

More information on our businesses can be found on the following websites:

www.dimensions.co.uk
www.alexandra.co.uk
www.yaffy.co.uk

Our Executive Leadership Team with responsibility for modern slavery within the group are as follows:



We operate in the apparel sector and with that, comes a level of risk. We recognise that our supply chains are labour intensive and our sourcing countries come with their own level of inherent risk.

Our sourcing regions are based in Bangladesh, Sri Lanka, Indonesia, Pakistan, Vietnam, China, Madagascar, Mauritius, Morocco, Romania, Poland, Lithuania, Cambodia, Egypt, Romania, Portugal, Myanmar and the UK

Quarterly meetings are held with the Executive Leadership Team to ensure progress is being made in areas of the business that can have an impact on modern slavery.

KPI reporting is issued and discussed, training plan and implementation results are reviewed and future initiatives are proposed. These meetings are followed by

quarterly and bi-annual meetings where the Board of Directors are present and our concerns and future initiatives are considered.

We have made the decision to move the financial year end from March to August and have taken advantage of the Government's extension in reporting on modern slavery as we have taken our role of supporting our key, frontline worker customers very seriously. We have been proud to support institutions such as the NHS and leading supermarkets through unprecedented times. Therefore, due to the Covid-19 pandemic, our statement is being published later than normal.

Policies & Procedures

Detailed below are our group policies and procedures that we see as core in our journey of tackling modern slavery:

Recruitment

As part of a structured recruitment procedure, we complete Right to Work checks in accordance with the Immigration, Asylum and Nationality Act 2006 and the Immigration Act 1971 to ensure that all employees have the right to work in the UK for the duration of their employment. We also check that our employees are the correct legal minimum age to work in the UK. If an employee is under the age of 18, a Young Person's Risk Assessment is completed including all entry level Apprentices and any work experience students.

Remuneration

Globally, we adhere to all minimum wage legislation and in the UK all employees and consultants are paid in accordance with the National Living Wage requirements. Those undertaking a National Apprenticeship are paid in-line with pay legislation. We also have Remuneration Committee that is chaired by our Chief Executive Officer.

Working Hours

All employees are provided with Terms and Conditions of Employment which stipulate the number of contracted working hours. We do not have any zero-hours contracts. Contracted working hours are a maximum of 40 hours per week and employees are given the opportunity to opt out of working additional time, in accordance with the Working Time Directive. The Young Person's Risk Assessment highlights the minimum rest guidelines which must be adhered to. All of our employees are provided with two, paid, ten-minute breaks per day.

Equality

Our business adopts an equal opportunities and diversity policy which ensures that we comply with all obligations. We are opposed to all forms of unlawful and unfair discrimination or victimisation, and this extends to job applicants as well as employees. Decisions about recruitment and selection, promotion or training are made objectively and without discrimination. Our policy will help all of those who work for us to develop their full potential and to fully utilise resources. All complaints of discrimination will be dealt with by our Grievance Procedure.

Employee Voice

Workers committees are active within all parts of the business. Membership comprises employee representatives who have been elected by their colleagues. The forums are designed to allow for an employee voice within the organisation, to address a variety of issues including working environments, working practice improvements and day-to-day Health & Safety matters.

Procurement Policy

General

We fully support and endorse the ETI 9 Point Base Code and expect suppliers to:

- Act in compliance with relevant laws and regulations.
- Adopt requirements similar to those contained in the ETI 9 Point Base Code for their own suppliers.
- Where there are differences between local law and the ETI Base Code, we expect our suppliers to adopt the principle that will provide the worker with the greatest protection.



Employment is freely chosen



Child labour shall not be used



Regular employment is provided



No discrimination is practiced



Living wages are paid



Working hours are not excessive



Working conditions are safe and hygienic



Freedom of association and the right to collective bargaining are respected



No harsh or inhumane treatment is allowed

Ethical

We expect suppliers to:

- Prevent unfair, unreasonable and unethical business practices.
- Prevent the use of any form of bribery or improper offers to or from employees or organisations.
- Respect confidentiality and protect confidential information.
- Acknowledge the interdependency between business and the communities in which they operate in order to minimise the negative impact of core business activities.

Diversity

Our business is committed to placing equality, diversity and fairness at the heart of our values, policies and everyday practices. We expect suppliers to support this by promoting fair participation and equality of opportunity for all their employees and job applicants, and by providing an environment in which all individuals are able to make best use of their skills, free from discrimination or harassment. Suppliers will be required to demonstrate their commitment to, and deployment of, appropriate policies and processes promoting equality, diversity and fairness as part of supplier selection and on-going supplier performance management.

Modern Slavery

We expect our suppliers and subcontractors to implement and enforce effective systems & controls to ensure that slavery and human trafficking do not take place anywhere in our supply chains. We work with suppliers to evaluate human trafficking risks and slavery risks in our supply chain, and our risk based supplier audit process covers safety, slavery / forced labour, child labour and other legal requirements.

Sub-Contracting (Transparency)

On top of mapping our supply chain that is key to eliminating modern slavery, we have a robust approach to on boarding new suppliers. Our terms and conditions are set out in our operating manual that details our sub-contracting policy. We have a zero-tolerance approach to unauthorised sub-contracting and require all suppliers to sign the policy. If we are not aware of the location where our products are manufactured, then this proposes our greatest risk in relation to modern slavery as we are unable to monitor working conditions and worker welfare.

Employer Pays Principle (EPP)

We adopt the Employer Pays Principle and believe that the costs of recruitment are not met by employees, but by us as the recruiting company.

Whistleblowing

We have a whistleblowing policy to demonstrate our commitment to the highest standards of openness, integrity and accountability. The whistleblowing procedure is communicated to all employees on the commencement of their employment with us. Should an employee wish to report an issue anonymously, they can do so by calling the Whistleblowing hotline administered by the independent organisation, The Network. The telephone number is 0800 404 9532 and operates 24 hours a day, 7 days a week.

Additionally, all of our suppliers have access to an email address that is linked directly to the UK Compliance Team. This is detailed on a poster where workers are provided with the Ethical Trading Initiative Base Code and information on their rights. Any issues relating to modern slavery can be reported using this communication method.

Assessing and Managing Risk

Internal Assessment of Risk

In January 2020, Measured Identity Hub became members of the Slave-Free Alliance. We are very proud of the membership and the strong benefits it brings to us as a business. In our supply chain, we would look to utilize our membership of Slave-Free Alliance, who offer tailored and robust recommendations to guard against infiltration by those seeking to exploit people through modern slavery.

In November 2020, we took part in a gap analysis with the Slave Free Alliance who acted as our 'critical friend', discussing the ways in which we could continue our journey in tackling modern slavery.

We plan to use their services to protect our own supply chain through improved policies, training and assessment.

Managing Sector Risk

We recognise that the apparel sector that we operate in comes with inherent risk. We also acknowledge that our sourcing countries come with their own risks. As mentioned above, our sourcing countries are Bangladesh, Sri Lanka, Indonesia, Pakistan, Vietnam, China, Madagascar, Mauritius, Morocco, Romania, Poland, Lithuania, Cambodia, Egypt, Romania, Portugal, Myanmar and the UK.

We have recently introduced a new Risk Management Framework, which has outlined our commitment, processes and methodology for identifying, assessing and mitigating risk. We have processes in place to assess risks at a corporate level, operationally and for project implementation.

We have a Corporate Risk Register to ensure we regularly review the changing risks in our industry, for the benefit of our customers, suppliers and our staff.

We believe in the importance of the long-standing relationships that we have with our suppliers and we see them as partners, who share in the successes that compliant business practices brings.

The main supply route for our production is from Bangladesh. Due to the high-risk nature of Bangladesh as a sourcing country, we have an office based in Dhaka with 25 employees who have a constant presence in our factories.

Our products are designed in-house and manufactured by our third party factories. We have a dedicated Ethical Compliance team who work closely with our Sourcing team ensuring new and existing suppliers are meeting our expectations.

Country Risk - China
We are aware of the high-risk that sourcing from China currently poses on our business. We value our supply chain partners in China and we are closely monitoring the reports of human rights violations in China and if they are negatively affecting our supply chain. Measured Identity Hub prohibits the use of forced labour in all forms and we require our suppliers to uphold human rights, in line with the UN Declaration of Human Rights. If suppliers are found to knowingly breach these requirements and do not respond to efforts to improve, then business relationships are subject to termination. Our supplier partners are made aware of this requirement and agree to our terms.

Due Diligence and Remediation

Supplier Monitoring
Our current process of mapping our suppliers and deciding what level of monitoring is required is determined by the tier in which the supplier falls in. We have 5 Tier classifications:

Tier 1	Garment manufacturers we have a direct trading relationship with	Contact with the supplier is held directly with Mi Hub employees	Fully mapped
Tier 2	Agents are the chain of communication between mi hub and the garment supplier	PO's are placed with the agent and they place orders in authorised factories	Fully mapped
Tier 3	Accessory suppliers	Trim and component suppliers who we buy from will now be included in their own tier	Partially mapped through tier 1 & 2
Tier 4	Fabric mills	Mills will now be split into their own tier to allow greater transparency and their own form of monitoring	Partially mapped
Tier 5	Stockists	Provider of goods which are not made to order	Partially mapped

Tier 1 and tier 2 suppliers are required to provide the same level of transparency. Visits to the site are conducted regularly by members of our Compliance, Sourcing, Purchasing or Product Development teams. Sedex Members Ethical Trade Audits (SMETAs) are conducted by our third party audit company on a minimum annual basis. We recognise the limitations that audits provide when monitoring for modern slavery, however we use this as a benchmark tool and work with suppliers to develop their management systems and training programmes to help raise awareness and eradicate the potential issue of modern slavery in our supply chain.

We audit on a semi-announced basis with our third party audit company. We understand the limitations an unannounced audit can have on a supplier concerning the correct people present during an audit and all documentation being readily available for review. Therefore, we have decided that semi-announced audits are what we should be implementing throughout our supply chain.

Tier 3, 4 and 5 suppliers are required to submit a Supplier Self Declaration form that details their processes and procedures relating to their supply chain monitoring. Within the Self Declaration form, there are questions on modern slavery to determine the supplier's stance and reporting requirements on modern slavery.

Supplier On-Boarding

We have developed our corporate wear with a conscience (CREATE) strategy to enhance our supplier on-boarding process to ensure suppliers are conforming to the UN Guiding Principles on business and human rights.

After identifying the areas of our business that pose the greatest risk, we have developed a robust supplier on-boarding process, which is conducted by the Ethical Compliance team, works towards monitoring suppliers for modern slavery risks and protecting workers' rights. Our movements towards eradicating modern slavery are set out in the below policies and processes

- Vendor Starter Pack includes the sub-contracting declaration, supplier guidance documents, ETI Base Code and self-assessment questionnaire.
- Anti-Bribery & Corruption policy
- Supplier visits and evaluations

Without the completion of the above documentation and supplier visits, our supply chain directors and management will not sign off the approval of a new supplier site.

Recruitment and Preferred Supplier List
The business operates a Preferred Supplier List (PSL) for all recruitment agencies which commenced January 2017 and takes effect for three years. All agencies have provided information of their adherence to the principles of the Modern Slavery Act.

We audit recruiters on the PSL who currently turnover more than £36m in accordance with the Act. When we recruit individuals, we conduct the relevant Right to Work checks as detailed above in our Recruitment Policy.

Remediation

If modern slavery is found in our supply chain or business, it is important that we treat each case individually. The first step would be to ensure the victim of modern slavery is removed and protected from the situation and taken out of harm's way. If instances of modern slavery were found in our business or operations in the UK, we would report to the authorities via the National Referral Mechanism and support the government agencies to carry out their investigations.

In our supply chain, we would look to utilize our membership of the Slave Free Alliance, who are experts in identifying and remediating modern slavery and forming remedial action plans. They are part of a charity that works directly to identify and support victims, including forming remedial action plans. They can support in ensuring the victim has been safely removed from harm's way and a plan of action can be established to ensure the victim can return to life free from modern slavery.

Effectiveness/ Performance Indicators and Training

As a business, we recognise that to eradicate modern slavery from our business and supply chain requires involvement from all areas of the business that can have an impact on supply chain conditions.

Performance Indicators in the Supply Chain
We have collaborated with Intertek on their Inlight programme and in November 2020 we asked our top 10 suppliers to complete the Modern Slavery Self-Assessment Questionnaire (SAQ). The programme was an effective way to uncover factors that may not be visible during an audit. It also allows us to access and benchmark our suppliers against a global database. We aim to continue our work with the Inlight programme for continuous monitoring of our supply base.

Training

We have been members of the Ethical Trading Initiative for 15 years and use our membership to drive sustainable change within our business and supply chain. We have partnered with the ETI to deliver training to our staff on the requirements of the modern slavery legislation, the signs they should look out for in order to detect modern slavery in our supply chain and how their behaviour can impact working conditions in our supply chain.

Every 6 months we run the ETI Buying Ethically course for our staff who could affect conditions in the supply chain. We have expanded our scope for this training and invited our customers to join in with the sessions. We commit to continue this training through collaboration with the ETI to assist in the understanding of the global impact decisions that customers and commercial leads can have on the supply chain.

Additionally, we have an eLearning course specifically on modern slavery that our staff can access at their convenience and our CSR team regularly attend webinars and working groups with both the ETI and the Slave Free Alliance to keep up to date with the latest information regarding modern slavery.

Performance Against Key Focus Areas for 2020/2021

- Continue to map our tiered suppliers to ensure our whole supply chain is captured and mapped. – Tiers 1, 2 and 4 are fully mapped. A working group has been formed to continue mapping Tiers 3 and 5.
- Extend our training in collaboration with the Ethical Trading Initiative and seek the assistance of 3rd party not for profit organisations to help drive understanding of modern slavery risks and developing our knowledge on the subject across all of our employees and supply chains. We will also be raising awareness through promoting Anti-Slavery Day. – Achieved. Our membership of the Slave Free Alliance and the participation of the Inlight Programme has helped us to develop our knowledge and raise awareness.
- Audit Preferred Supplier's from our UK recruitment agency providers who turnover in excess of £36 million. Through initial conversation followed up with written completion of our Modern Slavery Audit, data gathered will form part of our selection process. – Achieved. Our recruitment agency providers are now audited.

Key Focus Areas for 2021/2022

- Continue our work on the Inlight programme and roll out the programme beyond our top 10 suppliers.
- Engage and collaborate with our customers and other businesses to raise awareness of modern slavery, driving sustainable change.
- Increase our monitoring of our China facilities and their recruitment

The board of directors of Measured Identity Hub Ltd delegated approval of this statement on its behalf to the Chief Operating Officer of the company.

Hayley Brooks
Chief Operating Officer
Measured Identity Hub Ltd





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