

## Modern Day Slavery Board Statement for the financial year ending 31st December 2021

This statement is made pursuant to s.54 of the UK Modern Slavery Act 2015 (the 'Act') which requires businesses to state the actions taken throughout the financial year to ensure the risk of Modern Slavery is mitigated in our own business and throughout our supply chains.

Michael Davies & Associates Limited (trading as Staci) supports the objectives of the Act in eliminating slavery, servitude, human trafficking and forced labour and we are committed to ensuring our practices and procedures, and those of our supplier partners, are in line with this.

Staci has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity and transparency in all our business dealings and to putting effective systems and controls in place within our own business and our supply chains.

Our policy on Anti-Slavery and Human-Trafficking applies to all persons working for, or on behalf of, Staci, in any capacity. This includes but does not limit the policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives, and all supply partners.

Our comprehensive programmes and processes have led to the development of an effective system to:

- Identify, assess and mitigate any potential risks within our own operation
- Identify, assess and mitigate any potential risks within our supply chain
- Undertake further due diligence on high risk supply partners
- Protect whistle-blowers

## Our Business

Staci is the UK's leading marketing fulfilment and procurement specialist dedicated to the design, sourcing, storage and distribution of marketing materials, point of sale items and core products for many of the world's biggest brands.

With 6 UK fulfilment centres and over 400 members of Team Staci, supported by 1,900 team members and over 50 regional warehouses throughout Europe, Staci provides purpose built logistics solutions through our unique pan-European fulfilment network.

## Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner, which include:

- Staci Code of Conduct
- Supplier Code of Conduct
- Recruitment and Selection Policy
- Whistle Blowing Policy
- Equal Opportunities
- Anti-Bribery and Corruption

## Due diligence process in our business

Through audited assessment of our employment arrangements and Human Resources policies, it has been determined that the risk of any offences occurring in modern slavery and people trafficking is low.

Staci utilises temporary employees in addition to our permanent employees to support our business needs. To ensure temporary workers are treated fairly Staci complies with Agency Worker Regulations 2010.

Staci adheres to the standards of the National Living Wage legislation and Minimum Wage legislation in the UK. This is reviewed on an annual basis.

In the UK we undertake verification of all individuals, as required by UK legislation, prior to appointment.

To date there have been no reported incidents of slavery, servitude, forced or compulsory labour or human trafficking relating to Staci's employment arrangements recorded through the whistle-blowing process, and no issues came to our attention through its other management and HR processes.

## Training

All UK employees are required to read, sign, and comply with our HR and Ethics & Compliance policies, which include the Modern Slavery policy.

## Due diligence in our supply chains

Staci's diverse range of activities has resulted in a supply chain that ranges from larger corporate enterprises to small family run businesses.

Staci expects its contractors, suppliers, and other business partners to uphold high standards in all business practices and to share our zero-tolerance approach to slavery and human trafficking. We expect all suppliers to comply with all relevant laws of the country in which they operate.

Staci are members of both Supplier Ethical Data Exchange (SEDEX) and EcoVadis. These are membership schemes which assist companies to assess and map risks in their supply chains. The SEDEX and EcoVadis systems allow Staci to access audited information uploaded by suppliers, giving us a better insight into their supply chains.

For manufacturing facilities in the supply chains of high risk suppliers we request that the operators of those facilities adhere and sign up to the Staci Environmental, Ethical and Quality code of conduct which includes prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, and anyone held in slavery or servitude. Internal due diligence is carried out to verify there are no convictions or offences related to modern slavery and where applicable on site audits are carried out. Approval status is reviewed on an annual basis.

Should a supplier fail to provide the information requested or to meet Staci's expectations, Staci will take appropriate action, which may include not entering into a relationship or terminating the relationship with the supplier concerned.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Staci slavery and human trafficking statement for the financial year ended 31st December 2021.

APPROVED BY THE BOARD,

on 3rd JANUARY 2021



Signed:.....

Wayne Chapman, Managing Director, Michael Davies & Associates Limited t/a Staci