

# mi hub

modern slavery  
statement

mi hub modern slavery statement . August 2022



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 2022 and outlines our commitments to mitigate the risk of modern slavery occurring in our business and supply chain in the coming year.

# table of contents

## pages

5	Introduction
6-7	Organisation Structure
8-11	Policies and Procedures
12-13	Assessing and Managing Risk
14-15	Due Diligence and Remediation
16	Effectiveness/Performance Indicators and Training
17	Progress Against Key Focus Areas 2020/2021
18	Key Focus Areas 2022/2023

# 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.

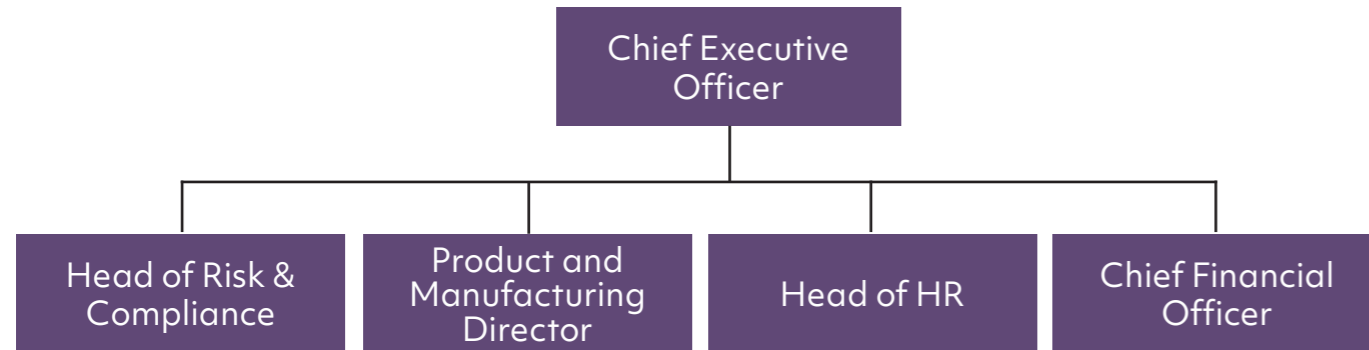
 <p>UK market leader in corporate clothing</p>	 <p>One of the largest US experts in corporate clothing</p>	 <p>A leading supplier in high performance outerwear and technical clothing</p>	 <p>A workwear supplier for over 150 years</p>
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- The group turnover for 2022 is c £185m
- Employs more than 750 people across its offices in the UK, Europe and the US.

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

- <https://www.dimensions.co.uk>
- <https://www.alexandra.co.uk>
- <https://www.affinitymihub.com>
- <https://www.mihubglobal.com>

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, Romania, Poland, Lithuania, Cambodia, Egypt, Portugal, Mexico, Italy, Dominican Republic 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.

In line with our financial year end and the proposed single reporting deadline, we now look to publish our statement on an annual basis in August.

# 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 a Remuneration Committee that is chaired by our a non-executive director.

## 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, regulations and ETI Base Code.
- 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 - New for 2022

We now have a Modern Slavery Policy which specifies our requirements and expectations of our suppliers in relation to Modern Slavery. This policy includes contact details to report potential breaches of regulation or policy. Mi hub encourages its suppliers to raise concerns so that we can support in finding appropriate solutions and remedy.

## Sub-Contracting (Transparency)

On top of mapping our supply chain, 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. It is this consideration that lead us in January 2022 to implement subcontracting audits into our CSR program as an additional tool to provide further transparency and reassurance.

## 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 and expect our suppliers to adopt an equivalent standard.

## 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. Contact details are also included in the Modern Slavery Policy.

# 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, which is referenced in our 'Country Risk' section below. As mentioned above, our sourcing countries are Bangladesh, Sri Lanka, Indonesia, Pakistan, Vietnam, China, Madagascar, Romania, Poland, Lithuania, Cambodia, Egypt, Portugal, Mexico, Italy, Dominican Republic 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. Modern slavery is on the Corporate Risk Register so it is actively discussed by our Executive Leadership Team and the Audit and Risk Committee.

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. In 2021 the Ethical Compliance team have also taken on the role of on-boarding new suppliers to ensure due diligence is carried out in making sure any new supplier can meet the requirements of Mi Hub and our customers.

### Country Risk

Mi Hub acknowledges the inherent risk that sourcing offshore in the garment sector can bring. After our focus on China in 2021 where we assessed geographical location of our factories and ensured our supply partners' adherence to our Cotton Policy by way of a signature, we are now utilising the Amfori Country Risk register to assess inherent risk of our different sourcing countries. We have also incorporated that risk data into KPI information submitted to the Board every month.

In 2021, we utilised our membership of the Ethical Trading Initiative to closely follow the military activity in Myanmar which led to the coup. As we had minimal business in Myanmar and we could still support the manufacturer we used to source from Myanmar, utilising a factory of theirs in another country, we took the decision to withdraw from Myanmar as a sourcing country using guidance from the Ethical Trading Initiative. We considered the risk too great to continue to produce out of that country at this time.

# 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 is reviewed every 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 have asked our key strategic suppliers to complete the Modern Slavery Self-Assessment Questionnaire (SAQ). The programme is 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 are also tracking performance indicators through a new reporting tool that allows us to produce KPI data from social audits, allowing us to easily identify factories that may require support.

## Training

We have been members of the Ethical Trading Initiative for over 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.

During 2021 we developed and have now started to roll out training for our supply chain specifically on the topic of Modern Slavery. This will be continue in 2022 and 2023.

## Progress Against Key Focus Areas for 2021/2022

- Continue our work on the Inlight programme and roll out the programme beyond our top 10 suppliers. – Update on progress - We have identified an additional 10 strategic suppliers to participate in the Inlight and training programs and we will continue to roll this out in 2022.
- Engage and collaborate with our customers and other businesses to raise awareness of modern slavery, driving sustainable change. – Update on progress – throughout 2021 we have participated in a working group with one of our major customers on Modern Slavery.
- Increase our monitoring of our China facilities and their recruitment – Update on progress – In general, we have increased our monitoring of all suppliers by utilising audits to focus on transparency and subcontracting.

## Key Focus Areas for 2022/2023

- Continue to rollout the Inlight program and training to our supply base.
- Facilitate collaboration between peer educators in our supply chain using our various memberships.
- Encourage internal staff participation in training specific to modern slavery.
- Investigate the potential of our business supporting victims of Modern Slavery back to employment.

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

Hayley Brooks  
Chief Executive Officer  
Measured Identity Hub Ltd





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*Alexandra*