

Modern Slavery Policy Statement

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AMENDMENT LIST

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1.0 OUR BUSINESS

Mia Direct Ltd. are a managed services provider of communications engineers. We supply qualified, fully equipped teams offering a service to our clients that gives value, reliability, flexibility and partnership with a view to ensuring jobs and projects are completed in a timely and efficient manner first time.

We can consult to offer plans and solutions to our client's communications infrastructure requirements or work with the client's own specifications on any project. Our fibre and Data engineers are based all over England and Scotland. We currently have deployments in Scotland central belt, Midlands and the North west and East.

With a staff level of 15, Mia Direct Ltd is a fast-growing Telecommunications provider working with some of the key established operators. Whilst undertaking a turnkey solution for delivery, Mia Direct Ltd recognise the increase in demand from the operators following significant investment to expand infrastructure which is expected to out strip the supply of UK based resource with a possible influx of migrant workers. Mia Direct Ltd will be focused to address the potential higher risk posed from migrant workers to compliance with the Modern Slavery regulations. Exposure should be minimised by following robust onboarding processes used by our clients.

2.0 POLICY

At Mia Direct Ltd, the Senior Management Team recognise that Modern slavery is a crime and a violation of human rights. Modern slavery is defined as defined in numerous forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Each facet has the common theme regarding the deprivation of a person's liberty by another in order to exploit them for personal or commercial or financial gain. Mia Direct Ltd adopt a zero-tolerance approach to modern slavery and are committed to conducting our business-related activities in an ethical manner with integrity at the core of all our business dealings and relationships. The Senior Management team will strive to cascade this ethos towards Modern Slavery to all levels of Mia Direct Ltd and to implement & enforce effective processes and controls to ensure modern slavery is not present anywhere in our own business or our supply chain.

Mia Direct is also committed to ensuring there is full transparency in our approach to tackling modern slavery throughout our supply chain. Mia Direct will promote a reciprocal expectation regarding the same high standards from all of associated contractors, suppliers and business partners against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Mia Direct Ltd expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for Mia Direct Ltd or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

3.0 RESPONSIBILITIES

3.1 Managing Director.

Overall responsibility for the policy implementation and review rests with the MD. The MD must enforce the policy and be responsible for ensuring that only competent operatives (internal), appointed contractors (external) and reputable supplier are allowed represent Mia

Direct Ltd who hold the same high moral standard regarding compliance to the Modern Slavery Act 2015. Required to identify the training required within the business.

3.2 Project Manager.

Adhere to the requirements of the policy. Be vigilant in the monitoring of all contractors appointed to undertake work on behalf of Mia Direct Ltd for potential signs of to the non-compliance to the policy. Nominate only reputable suppliers and contractors to meet the demands of the business.

3.3 HSEQ Manager.

Audit the effectiveness of the process controls adopted by Mia Direct Ltd to ensure compliance. Undertake robust due diligence checks of all supplier and contractors nominated to represent Mia Direct Ltd.

3.4 Employee.

Adhere to the requirements of the policy. Be proactive in reporting of any potential issues relative to the non-compliance to the policy.

3.5 Contractor.

Adhere to the requirements of the policy. Maintain adequate controls to meet the high standard of compliance to the Modern Slavery Act 2015. Be transparent and proactive in reporting of any issues relative to the potential non-compliance to the policy which could put the working relationship at risk.

4.0 CONTROLS FOR COMPLIANCE

MIA Direct Ltd have a number of policy and procedures within the organisation which will aid to the protection of the business from possible non-compliance. Through effective on-boarding and due diligence checks of individuals, contractors and suppliers by way of rights to works checks, Approved Service Providers audits and validation of payment of wage into dedicated bank accounts Mia Direct Ltd will reduce the potential exposure to policy breach. Validation of contractors and suppliers will be documented in the Control of Contractors policy.

5.0 LEGISLATION AND EXTERNAL REFERENCES

Modern Slavery Act 2015

6.0 COMMUNICATION AND AWARENESS

At Mia Direct Ltd the training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

Working on the BT network will require all operatives to undertake operator specific training whereby Modern Slavery is covered as a module as mandatory.

The zero-tolerance approach adopted by Mia Direct Ltd to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and

reinforced as appropriate thereafter. This will be communicated as part of an induction pack following successful completion of the Supplier Pre-Qualification process.

7.0 POLICY BREACH

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Mia Direct Ltd will terminate all working relationship with any other individual(s) and organisations working on our behalf if they breach this policy.

8.0 REPORTING POTENTIAL BREACH

All potential reports of a breach to the policy and the Modern Slavery Act 2015 should be reported to either the Managing Director or the HSEQ Manager immediately in person or by telephone detailing the facts surrounding the breach.

Modern Slavery Act [2015]
2021 UK annual report on modern slavery (November 25th 2021)
Modern Slavery Act Policy and Statement 2021 to 2022

If you have any questions about the guidance or the content then email the Modern Slavery Unit on: NRMReform@homeoffice.gov.uk.