

Modern Slavery Act 2015 Statement

Our Policy

XMA Limited is fully committed to all Corporate Social Responsibilities from both a legal and ethical basis, which includes a zero tolerance approach for slavery and human trafficking. We pride ourselves on delivering the best possible results for our stakeholders; Customers, Vendors, Shareholders, Employees, Environment, Community and Industry.

Our Business

As a UK based reseller and manufacturer, XMA comply with all provisions of the Modern Slavery Act 2015 with regards to our operations within the UK. More information on our business is available at www.xma.co.uk.

We are part of the Westcoast (Holdings) Limited group of companies ("Group"). A Group company, Westcoast Limited, is an award winning UK IT Distributor with strong partnerships with global vendors. Founded in 1984, the Group remains privately held, with an aggregate turnover in excess of £1.6bn and employs over a 1200 people across multiple sites in the UK and Europe. More information on the group is available at www.westcoast.co.uk

Our Structure

Our business is organised into four main business units: Government, Education, Scotland and Corporate. We resell and manufacture IT solutions using industry-leading technologies and provide sales and services support to our customers.

Our Supply Chains and Policies on Slavery and Human Trafficking

The products that we sell are sourced from reputable suppliers who are based throughout the world. Meeting the requirements of the Modern Slavery Act is included in our Terms and Conditions of engagement with Suppliers and Sub-Contractors that they comply with the requirements of the act.

Within our supply chain, XMA trade with reputable suppliers who have all committed to meeting the requirements of the Modern Slavery Act. For all of our major suppliers, these are members of the Electronic Industry Citizen Coalition (EICC), which requires commitment to the EICC Code of Conduct that clearly states a zero tolerance approach to slavery and human trafficking to retain membership, and EICC do perform audits at production facilities worldwide to confirm compliance.

For members of our supply chain that are not affiliated to the EICC, we have contacted all our major suppliers and those that we consider to be of high risk, to confirm their approach to either working towards or confirming compliance to the Modern Slavery Act and we will continue to monitor and request information from all major suppliers to ensure continued compliance to required deadlines.

Procedures on Slavery and Human Trafficking

As part of our compliance with the policies referred to above, we take the following steps:

- Evaluate and monitor potential risk areas in our supply chains at regular intervals;
- Provide transparency in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains by reviewing, where necessary, our suppliers and carrying out suitable checks;
- Employees provide original documentation confirming proof of ID and address;
- All contractors, temporary staff and employee remunerations paid into authorised accounts.

To raise queries about the detail of our company's specific provisions for the Act, or to report suspected incidences, please use the contact details provided below.

Training

All contractors, temporary staff and employees who carry out work for XMA have agreed Terms and Conditions in place. To ensure a suitable understanding of the risks of modern slavery and human trafficking in our business and our supply chains, relevant employees in our business will participate in training on an ongoing basis, as required.

Assurance and Key Performance Indicators

We report on compliance within our Group every 6 months. Our internal audit process ensures that we have had responses from all relevant suppliers and a review is undertaken of their compliance. We will continue to develop and monitor suitable key performance indicators to measure our compliance with our group and internal policies in this area.

Nature of this Statement

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.

The Board of Directors of XMA Limited delegated approval of this statement on its behalf to the Finance Director and Company Secretary of the Company, at its Board meeting on 26th January 2017.



Michael Ray

Finance Director and Company Secretary

XMA Limited

26th January 2017