

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 group of companies ultimately owned by Westcoast (Holdings) Ltd ("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 £2.2bn and employs over 1500 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. An obligation to meet the requirements of the Modern Slavery Act is included in our Terms and Conditions of engagement with Suppliers and Sub-Contractors.

Within our supply chain, XMA trade with reputable suppliers who, where applicable have committed to meeting the requirements of the Modern Slavery Act. All of our major suppliers are members of the Responsible Business Alliance (RBA), which demands adherence to the RBA Code of Conduct. This Code clearly states a zero tolerance approach to slavery and human trafficking to retain membership and RBA performs audits at production facilities worldwide to confirm compliance.

For members of our supply chain that are not affiliated to the RBA, we have contacted 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 standards.

Procedures on Slavery and Human Trafficking

As part of our compliance with the policies referred to above, we continue to 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 XMA'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 for their benefit. To ensure a suitable understanding of the risks of modern slavery and human trafficking in our business and our supply chains, all employees in our business will participate in awareness training going forward, 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.

In the Financial Year ending 31 December 2017 the following actions were achieved:

- Produced and distributed to all new Suppliers a Code of Conduct, which clearly states the standards of compliance expected of our supply chain with regards to the Modern Slavery Act. A copy of the code is [available here](#)
- Developed our application form for third party contractors to include compliance questions regarding the Modern Slavery Act, with XMA reserving the right to reject any contractor who does not or will not evidence such compliance.
- High level training program focused on the Modern Slavery Act was developed for inclusion within our Learning Management System, which will be accessible by all employees for training going forward
- Internal mapping and grading of our existing supply chain to identify which suppliers demonstrate the highest potential risk of non-compliance with the Modern Slavery Act.
- Our Procurement Director has carried out visits to major suppliers within China and Eastern Europe to validate their compliance with the Modern Slavery Act

In the Financial Year ending 31 Dec 2018, we are aiming to achieve the following:

- Consolidate supply chain partners to achieve 95% of spend attributed to Tier 1 Suppliers who can evidence Modern Slavery Act compliance
- Continue to visit supplier locations worldwide, with a specific focus on auditing suppliers who have been identified as presenting the highest risk of non-compliance with the Modern Slavery Act.
- Roll out our Code of Conduct to existing suppliers to confirm their compliance with the Modern Slavery Act and also detail what actions they are taking in 2018 to maintain their compliance
- Develop and deliver an in-depth training programme for our commercial divisions who directly engage with our supply chain, to ensure full understanding of Modern Slavery Act compliance and obligations are understood by these employees

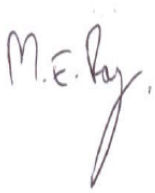
Nature of this Statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes XMA's slavery and human trafficking statement for the financial year ending 31 December 2017.

Group Tax Strategy

[Download](#) the Westcoast Holdings document.

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 27th February 2018.

A handwritten signature in black ink, appearing to read 'M.E. Bay'.

Contact hr@xma.co.uk in writing by email clearly referencing 'Modern Slavery Act' in the subject line.

Finance Director and Company Secretary
XMA Limited
28th February 2018