



XMA Holdings Ltd : Anti-Slavery Statement for year ended 31 December 2022

1: Introduction

XMA Holdings Ltd (“XHL”) is committed to preventing acts of Modern Slavery and Human Trafficking from occurring within its group business and supply chain and imposes the same high standards on its suppliers. XHL provides this public statement on behalf of the XMA Group (as defined below) in accordance with section 54 of the Modern Slavery Act 2015 (“MSA”).

During 2022 XHL continues to prioritise our approach to ethical processes and partnering responsibly to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. XHL were delighted to announce the acquisition of Livingston based Capito Limited (“Capito”) in 2022, adding to the portfolio of IT services that the Group offers to businesses across the UK. Our existing good practices will be introduced to the wider Group over 2023 and we are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

“The XMA Group takes its Anti-slavery and Human Trafficking requirements extremely seriously and is wholly committed to eliminating such practices from our supply chain. We are making significant efforts to ensure full compliance with our legal and social responsibility and as the Group grows, we continue to increase the number of staff to address these areas”
Kelvin Lee - Chief Operating Officer.

2: Structure of the organisation

XMA Holdings Ltd is the parent management company to the XMA Group of companies. In 2022 XMA Holdings Ltd acquired Capito Limited, an IT Managed Services company incorporated in Scotland (registered number SC127071). XHL is a company incorporated in England and Wales (registered number 13166183) and its registered office is at Wilford Industrial Estate Ruddington lane Wilford Nottingham NG11 7EP.

3: Business of XHL and its supply chains

XHL is solely a management company and does not actively trade. XHL does not therefore have its own website.

XMA and Capito are the actively trading companies of XHL. As at 31 December 2022, the XMA Group employed 515 people across business operations in the UK. XMA is a value added reseller of IT products and services working with a range of suppliers, almost all of which are global manufacturers such as HP, Apple, Dell and Lenovo Within the UK, XMA represent the tenth largest reseller of IT products and services. XMA’s registered and head office is at Wilford Industrial Estate, Ruddington Lane Wilford, Nottingham, Notts, NG11 7EP Nottingham. (Website <https://www.xma.co.uk/>).

Capito are a provider of IT services and solutions to Commercial and Public Sector organisations. Capito work with leading vendors and system integrators (SIs) to deliver agile and flexible solutions, supported by best-in-class technologies. Capito’s registered office is at Caputhall Road, Deans, Livingston, EH54 8AS (Website <https://www.capito.co.uk/>)

A copy of this statement will be placed on all company websites in the XMA Group.

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www.xma.co.uk
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Glasgow
Pavilion 2
Junction 24 Business Park
Helen St
Glasgow
G51 3AD

Livingston
Caputhall
Road
Deans
Livingston
EH54 8AS



4: XMA Group Policy on slavery and human trafficking

Slavery and human trafficking are illegal and a violation of human rights. There are many forms of modern slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain. The XMA Group has a zero tolerance approach to modern slavery and human trafficking; we are committed to acting ethically, and with integrity in all our business dealings and have appropriate policies in place that reflects our commitment to acting ethically and with integrity in all our business relationships.

The XMA Group expects suppliers and other business partners to uphold high standards in their business practices.

5: Practices of XMA Group

As part of the XMA Group's commitment to combating modern slavery, we have implemented the following practices within XMA and during 2023 will extend these to the newest member of the Group, Capito:

- Produce a Group Supplier Code of Conduct (the "Code")

<https://xmalimited.sharepoint.com/sites/QA/Procurement/MSD-PRC-D007.pdf?web=1>

which includes provisions on slavery and human trafficking and ensure all of our suppliers adhere to the principles of this Code as a minimum standard. The Code is also available on XMA's website.

- Our standard supplier agreement (which we ask new partners to sign) contains specific anti-slavery provisions and confirms adherence to our Code.
- XMA's standard terms of purchase

https://xmalimited.sharepoint.com/sites/QA/_layouts/15/Doc.aspx?sourcedoc=%7B4FEEAEAB-6126-4C8A-9AF6-08556AC18312%7D&file=MSD-CM-D005.docx&action=default&mobileredirect=true&DefaultItemOpen=1

refer to suppliers adhering to the MSA and our Code.

- If suppliers insist on us trading on their terms, we ensure we insert a clause noting they have to adhere to the principles of our Code and specific provisions relating to MSA compliance.
- We ensure our suppliers are aware of our practices and policies and adhere to the same high standards.
- We annually submit our Group Statement to the Transparency in Supply Chains ('TISC') Report, an open data modern slavery statement register to support the UK in fighting modern slavery.



6: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains.

We internally map and grade on a scale of 1-4 our supply chain to identify which suppliers demonstrate the highest potential risk of slavery and human trafficking. We place our supply chain into tiers with those that have a changeable workforce/country of manufacture representing the highest risk subject to a higher frequency of review/audit and direct Board sponsorship.

- monitor potential risk areas in our business and supply chains.

Through appropriate safeguarding plans and processes, with regular monitoring of relevant/vulnerable groups to reduce the risk of slavery and human trafficking occurring in our business.

- mitigate our potential for risk.

Our code sets out that both ourselves and our supply chain must categorically not employ child workers. Our internal recruitment policy is based on procedures that focus on compliance with all applicable legislation ensuring the right to work, validity of documents and work permits for foreign workers. Our recruitment process is centralised and governed through our HR team who work to our standard process of ensuring that all legislation is adhered to.

- provide adequate protection for whistle-blowers.

We have policies and procedures in place to enable our employees to whistle blow and have safeguards in place should the need arise for them to do so. XMA operate the mechanism contained in our Whistleblowing Policy of:

- an employee reporting in confidence to their immediate supervisor or if that is not possible to do so, to report to Clare Murray, (the “Whistleblowing Officer”);
- the Whistleblowing Reporting Form available on the Company intranet which can be emailed directly to the Whistleblowing Officer or posted anonymously;
- the ability for anybody to make an anonymous report in writing posted to the Whistleblowing Officer; and
- providing adequate protection for whistle-blowers on all matters including reporting cases of coercion or forced labour, through our ‘Whistleblowing Officer’. Any report submitted via whatever method will always be handled promptly and confidentially.

7: Risk and compliance

The XMA Group has for a number of years held a monthly compliance meeting with senior stakeholders to discuss any new legislation, horizon scanning, concerns and best practice. Our Modern Slavery Statements and best practice remain on the agenda. Attendance at these meetings



require a senior representative from each department to ensure a unified approach and to learn from the wider experience of Departments in the XMA Group.

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by monitoring any anti-slavery policy changes to high value suppliers to ensure any changes are assessed for potential risk or compliance failure.

We do not consider that the XMA Group directly operates in high-risk sectors or locations as most slavery and trafficking occurs within clothing and fashion (ready-made garments) and agricultural products or source raw materials from countries with high modern slavery risk.

Where we have identified a potential risk, these can be investigated, remediated and mitigated through activities such as due diligence, improved procurement practices or industry collaboration.

We ensure all our suppliers adhere to the principles of our Code. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

We elect department representatives who demonstrate our approach to identifying and eradicating modern slavery within our business in the processes that we take and our risk-based approach to both internal and external contextual factors. These include:

1. Our Procurement Management assesses the risk levels of modern slavery occurring in our chosen partner sector/country supply chain for every Partner annually.
2. Our Compliance Manager conducts audits on whether our partners have poor working practices.
3. Our Sales and Services heads investigate the type of workforce our partners employ.
4. Our HR Department monitors the type of workforce we are employing and what our policy is on temporary workers.
5. Our CPO reviews the pay scales we employ.
6. Our HR, Compliance and Training Departments manage the equality processes we have in place.

8: Training and Further Actions

The XMA Group has established a high level training program focused on the MSA, developed for inclusion within our Learning Management System, which was made compulsory for all current employees and permanently accessible by any employees for ongoing training.

Throughout 2023, we will review whether the XMA Group can improve on existing measures or take any additional steps to combat slavery. We will invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, we encourage employees to identify and report potential breaches. Our Learning Management System provides an audit of all staff that have completed the training and flags those that are overdue for management to enforce completion.



9: Sign-off

This statement is made in accordance with section 54(1) of the MSA and constitutes XHL's Anti-Slavery and Human Trafficking statement for the financial year ending 31 December 2022.

XMA Executive Board have approved this statement with the final approval from the XHL Board on 17th May 2023.

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Antony Taylor

Director for and on behalf of XHL and XMA Ltd

Date: 17th May 2023