

## **MIROMA GROUP MODERN SLAVERY STATEMENT**

### **1. INTRODUCTION**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”) and constitutes the Miroma Group’s modern slavery statement for the financial year ending 30 June 2019.

For the purposes of this statement, the Miroma Group includes the following companies together:

- Miroma International Limited trading as Miroma Outcomes, company number: 04462686;
- Way to Blue Ltd, company number: 03872642;
- The Contented Digital Media Company Limited, company number: 08333466;
- Twelve A.M. Media Limited, company number: 10350204; and
- New Stance Limited, company number: 10886931.

### **2. OUR ORGANISATION**

The Miroma Group operates across the media industry with a particular interest in media space trading, media and creative agency services and content production. The Group has approximately 110 employees in the United Kingdom and has offices in the United Kingdom, Canada and the United States. Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery. Our focus is therefore to ensure there are policies and procedures in place to ensure that our corporate activities and supply chains are free from slavery and human trafficking.

### **3. OUR SUPPLY CHAINS**

We work with a range of suppliers and other businesses, including media space owners, media agencies, corporate event service providers, international brands, media content distributors and producers, office service providers and media clients that we provide media services to.

We believe the nature of our work, our supply chain and our suppliers’ industries are low risk in terms of modern slavery and human trafficking.

Nevertheless, we wish to continuously improve our ways of identifying and eliminating any slavery and human trafficking in our business and supply chains. We recognise that risks of modern slavery change constantly, and we are committed to regularly reassessing and responding to any risks in our business and supply chains.

### **4. OUR POLICIES**

We operate a number of internal policies to ensure we are conducting our business in an ethical and transparent way. These include our whistleblowing policy, which encourages staff to report any concerns confidentially and without fear of repercussion.

### **5. DUE DILIGENCE**

As part of our initiative to identify and mitigate risk we undertake due diligence when taking on suppliers, as well as regularly reviewing existing suppliers.

We have systems in place to:

- Identify, assess and mitigate potential risk of slavery and human trafficking in our supply chains;
- Monitor potential risk areas in our supply chains; and

- Protect whistle blowers.

Should a supplier fail to provide any information requested or should they fail to meet Miroma's expectations, we will take appropriate action, which may include not entering into a business relationship or terminating an existing relationship with the supplier concerned.

The senior management teams of the companies within the Miroma Group are responsible for Miroma's anti-slavery initiatives, due diligence and policies. If you have any questions or concerns, please contact us by email at [legal@miroma.com](mailto:legal@miroma.com).

## 6. SUPPLIER ADHERENCE TO OUR VALUES

To ensure all those in our supply chain are in line with our policy towards slavery and human trafficking, we are putting in place a supply chain compliance programme. As part of this programme, we will enhance our due diligence and we also intend to review our agreements and dealings with suppliers to ensure compliance with anti-slavery measures. An example of this is that, in all new agreements with our business partners we shall require a legal obligation that they comply with the Act.

## 7. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide advice and guidance to our staff who are responsible for relevant supply chains and business relationships. We also will strongly encourage our business partners to provide training to their staff, suppliers and providers.

## 8. FURTHER STEPS

We intend to take the following steps going forward to continue our efforts to combat slavery and human trafficking:

- We will continue to raise awareness of modern slavery issues throughout the company, our supply chain and business relationships.
- We will continue to assist employees in being able to identify and prevent slavery and human trafficking.
- We will review and strengthen our policies and procedures to manage the risks of modern slavery within our business.

This statement has been approved by Marc Boyan, CEO, and constitutes the Miroma Group's modern slavery and human trafficking statement for the financial year ending 30 June 2019.

**Marc Boyan**  
CEO



28.03.2019