mi hub

modern slavery statement

mi hub modern slavery statement . August 2025

Our statement has been written and published in accordance with the Modern Slavery Act 2015. It details our reflection, approach and strategy in relation to modern slavery for financial year ending July 2025 and outlines our commitments to address and mitigate the risk of modern slavery and labour exploitation occurring in our business and supply chain in the coming year.

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Introduction

The Executive Leadership Team at Measured Identity Hub Ltd (Mi Hub) recognise that the health, safety and welfare of all employees both within its own operations and that within its supply chain, external stakeholders and the wider community who may be affected by its operations is of primary importance in the successful conduct of its business.

We consider modern slavery to be a crime of great seriousness, not only in the UK, but also on a global scale. The crime is committed by exploiting a victim for someone else's gain. Modern slavery is an umbrella term and can take many forms including debt bondage or bonded labour, forced labour, child labour, criminal exploitation, sexual exploitation, labour exploitation, domestic servitude, organ harvesting, forced marriage and state-imposed labour, all are underpinned by human trafficking which is the transfer or moving of those in situations of modern slavery or exploitation with the intention of exploitation for personal or financial gain.

As a business with increasing international presence, we look to not only adhere to and appreciate the standard of accountability set by the UK Government in the form of the Modern Slavery Act 2015, but also demonstrate our commitment to affect change within our global business and with our global partners.

Our approach is aligned to the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and reflects human rights as defined in the International Bill of Human Rights.

As members of the Ethical Trading Initiative (ETI), we also follow the ETI Base Code and require our suppliers to do the same. We follow and adhere to all local laws and regulations, and where these laws and human rights standards may differ, the higher standard is followed.

Organisation Structure

We have offices in the UK, Europe, Bangladesh and the US and are an international supplier of corporate clothing and uniform solutions to businesses and individuals, trading through our Dimensions, Affinity, Yaffy and Alexandra brands.

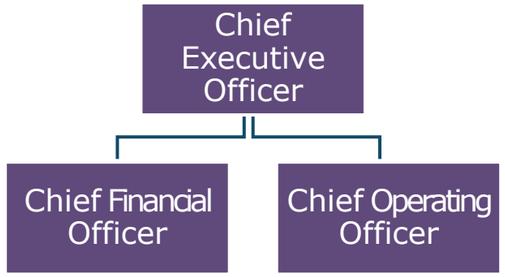
dimensions	affinity	YAFFY	Alexandra
UK market leader in corporate clothing	One of the largest US experts in corporate clothing	A leading supplier in high performance outerwear and technical clothing	A workwear supplier for over 150 years

- The group turnover for FY 2024/25 is c £130 million.
- Employs more than 600 people across its offices in the UK, Europe and the US.

More information on our businesses can be found on the following websites:

https://www.dimensions.co.uk
https://www.alexandra.co.uk
https://www.affinitymihub.com
https://www.mihubglobal.com
https://www.yaffy.co.uk

Our Executive Leadership Team with responsibility for modern slavery within the group are as follows:



We operate in the apparel sector and appreciate that this comes with a heightened level of risk. We recognise that our supply chains are labour intensive, and our sourcing countries come with their own level of inherent risk inclusive of discrimination, income shortages and modern slavery. We currently work with 61 suppliers over 88 garment manufacturing factories globally with our sourcing origins spanning 17 countries as detailed in the table below. We believe in the importance of the long-standing relationships that we have with our suppliers and see them as partners who share in the successes that compliant business practices bring.

Country	Factory	Suppliers
Albania	1	1
Bangladesh	18	15
China	28	18
Egypt	1	1
India	1	1
Indonesia	1	1
Italy	1	1
Madagascar	3	2
Mexico	2	2
Pakistan	3	2
Philippines	1	1
Romania	1	1
Sri Lanka	5	3
Tunisia	2	2
United Kingdom	7	7
United States of America	1	1
Vietnam	2	2

Regular Meetings are held between the Ethical Compliance team and the Product & Manufacturing Director to ensure that the business remains up to date with any emerging impacts relating to modern slavery.

KPI reporting forms part of this meeting, which consists of a review of any high-risk audit non-conformances. Also reviewed are any updates to legislation, customer requirements and expectations, developments in strategy and relevant third-party information which relates to ethical impacts. Any new initiatives implemented by the Ethical Compliance team would also be discussed.

Our robust internal employment practices and due diligence upheld by our HR team help to minimise the risk of modern slavery appearing in our own business through hiring methods. When using 3rd party labour providers, we operate a Preferred Supplier List and our monitoring of those suppliers is discussed below. Strong policies and procedures support the constant monitoring of modern slavery risk within our own business and 3rd party assessment through a SMETA audit validates our good business practices.

Policies & Procedures

Detailed below are our group policies and procedures that we see as core in our journey of addressing and mitigating modern slavery within our business. These are reviewed annually.

Recruitment

As part of a structured recruitment procedure, we complete Right to Work checks in accordance with the Immigration, Asylum and Nationality Act 2006 and the Immigration Act 1971 to ensure that all employees have the right to work in the UK for the duration of their employment. We also check that our employees are the correct legal minimum age to work in the UK. If an employee is under the age of 18, a Young Person's Risk Assessment is completed including all entry level Apprentices and any work experience students. Further, Right to Work confirmation checks are completed during day one of starting work with Mi Hub Ltd.

Remuneration

Globally, we adhere to all minimum wage legislation and in the UK all employees and consultants are paid in accordance with the National Living Wage requirements. Those undertaking a National Apprenticeship are paid in line with pay legislation. We also have a Remuneration Committee which meets at least annually, that is chaired by our non-executive director.

SMETA auditing of our garment manufacturers ensures that our supply chain partners are paying factory workers the legal in-country minimum wage and any overtime is paid at the correct rate. All payments owed to the workers are paid on time.

Working Hours

All employees are provided with Terms and Conditions of Employment which stipulate the number of contracted working hours. We do not have any zero-hours contracts. Contracted working hours are a maximum of 40 hours per week and employees are given the opportunity to opt out of working additional time, in accordance with the Working Time Directive. Any overtime conducted is freely chosen. The Young Person's Risk Assessment highlights the minimum rest guidelines which must be adhered to. All of our employees are entitled to paid breaks in accordance with the Working Time Directive'.

Equality, Diversity and Inclusion

Mi Hub is an inclusive employer that values diversity in its workforce, with policies in place to ensure we comply with all obligations. We are opposed to all forms of unlawful and unfair discrimination or victimisation. We encourage applications from all individuals without regard to race, religion, gender, sexual orientation, national origin, disability, or age. Decisions about recruitment and selection, promotion or training are made objectively and without any form of discrimination. Our policy will help all of those who work for us to develop their full potential and to fully utilise resources available. All complaints of discrimination will be dealt with by our Grievance Procedure.

Child Labour Remediation Policy

We are committed to monitoring and controlling all elements of the business that could pose a high risk for child labour, including our sources overseas. We prohibit child labour; however, we recognise that risk remains and where found must be addressed, and the child protected. The company requires that all suppliers shall recognise the UN Convention on the Rights of a Child, and that suppliers comply with the relevant national and international laws and regulations within the country of production. We create trusting partnerships with suppliers, which in turn creates a trusted and safe space for suppliers to come forward with concerns, without fear of retribution to ensure their management systems are sufficiently effective and robust to minimise the possibility of child labour being inadvertently engaged in employment.

Freedom of Association Policy and Employee Voice

Worker committees are active within all parts of the business. Membership comprises employee representatives who have been elected by their colleagues. The forums are designed to allow for an employee voice within the organisation, to address a variety of issues including working environments, working practice improvements and day-to-day Health and Safety matters. Meetings are held every two months to discuss any issues raised. A quarterly meeting is also held with the Mi Hub CEO and representation from each area of the business to raise salient issues within the company. We now also have a specific Freedom of Association policy.

Whistleblowing

We have a whistleblowing policy to demonstrate our commitment to the highest standards of openness, integrity and accountability. The whistleblowing procedure is communicated to all employees on the commencement of their employment with us. Should an employee wish to report an issue anonymously, they can do so by calling the Whistleblowing hotline administered by the independent organisation, The Network. The telephone number is 0800 404 9532 and operates 24 hours a day, 7 days a week.

Our suppliers have access to an email address that is linked directly to the UK Ethical Compliance Team. This is detailed on a poster provided during onboarding where workers are also given the ETI Base Code. Any issues relating to modern slavery can be reported using this communication method. Contact details are also included in the Modern Slavery Policy. In the event of an issue being reported from any origin, this will be escalated by the Ethical Compliance team to the Product and Manufacturing Director and dealt with accordingly.

Procurement Policy

Supplier Onboarding

- Our products are designed in-house and manufactured by our third-party factories. We have a dedicated Ethical Compliance team who work closely with our Sourcing team ensuring new and existing suppliers are meeting our expectations.
- After identifying the areas of our business that pose the greatest risk, we developed a robust supplier onboarding process. Since 2021, the Ethical Compliance team have taken on the role of onboarding new suppliers to ensure due diligence is carried out in making sure any new supplier can meet the requirements of Mi Hub and our customers prior to completion of onboarding. This monitors suppliers for modern slavery risks and advocates protecting workers' rights. Our movements towards eradicating modern slavery are set out in the below policies and processes:

- Completion of the Sedex SAQ.
- Review of Sedex SMETA audit prior to onboarding.
- Vendor Starter Pack including the subcontracting declaration, supplier guidance documents, and ETI Base Code (ETI Base Code supplied in local language where possible).
- Anti-Bribery & Corruption Policy.
- Supplier visits and evaluations.
- Without the completion of the above documentation and supplier visits, our supply chain directors and management will not sign off the approval of a new supplier site.

General

We fully support and endorse the ETI 9 Point Base Code and expect suppliers to:

- Act in compliance with relevant laws, regulations and the ETI Base Code.
- Adopt requirements aligned to those contained in the ETI 9 Point Base Code for their own suppliers.
- Where there are differences between local law and the ETI Base Code, we expect our suppliers to adopt the principle that will provide the worker with the greatest protection.

Ethical

We expect suppliers to:

- Treat all workers with respect and ensure their human rights and dignity are adhered to at all times.
- Enable access to remedy.
- Prevent the use of any form of bribery or improper offers to or from employees or organisations.
- Respect confidentiality and protect confidential information.
- Acknowledge the interdependency between business and the communities in which they operate in order to minimise the negative impact of core business activities.

Diversity

Our business is committed to placing equality, diversity and fairness at the heart of our values, policies and everyday practices. We expect suppliers to support this by promoting fair participation and equality of opportunity for all their employees and job applicants, and by providing an environment in which all individuals are able to make best use of their skills, free from discrimination or harassment. Suppliers will be required to demonstrate their commitment to, and deployment of, appropriate policies and processes promoting equality, diversity and fairness as part of supplier selection and ongoing supplier performance management.

Modern Slavery Policy

We have a Modern Slavery Policy which specifies our internal requirements, alongside our expectations of our suppliers in relation to Modern Slavery. This links to our Whistleblowing Policy and includes contact details to report potential breaches of regulation or policy. Mi Hub encourages its employees and suppliers to raise concerns so that we can support in finding appropriate solutions and remedy.

Sub-Contracting (Transparency)

On top of mapping our supply chains, we have a robust approach to onboarding new suppliers. Our terms and conditions are set out in our operating manual and our Supplier Code of Conduct details our sub-contracting policy, which is included in our Vendor Starter Pack. We have a zero-tolerance approach to unauthorised sub-contracting and require all suppliers to sign the policy. If we are not aware of the location where our products are manufactured, this poses the greatest risk in relation to modern slavery and labour exploitation as we are unable to monitor working conditions and worker welfare. The lack of transparency within the textile industry is one of the largest challenges to our work on mitigating modern slavery violations. It is this consideration that led us in January 2022 to implement sub-contracting audits into our ethical compliance program as an additional tool to provide further transparency and reassurance.
These Random Traceability Checks (RTC) are carried out by the third-party auditing firm, Seditex, and focus on ensuring there is no loss of traceability during the manufacture of the product. Whilst this is not a social audit focusing inherently on modern slavery or human rights, it serves as a potential marker for unauthorised sub-contracting. If any failures are detected during the audit, these would be followed up by the Ethical Compliance team to understand whether there have been any potential breaches to the Supplier Code of Conduct and Sub-Contracting agreement.

Employer Pays Principle (EPP)

We adopt the Employer Pays Principle and believe that the costs of recruitment are not met by employees, but by us as the recruiting company and expect our suppliers to adopt an equivalent standard. Excessive recruitment and visa fees are one of the mechanisms used by traffickers to trap employees into debt bondage.

Assessing and Managing Risk

Internal Assessment of Risk

In January 2023, initial strategy development began which led to an in-depth risk assessment and analysis taking place. This assessment involved initial review of broad industry human rights themes, a supply chain analysis across Tier 1 Goods for Resale, worker voice information and stakeholder engagement. An exercise was conducted on what could be caused, contributed or be linked to in terms of human rights violations. Risks were subsequently categorised into a matrix for likelihood and severity at a more granular level to allow for prioritisation. This allowed for a more visual overview of our greatest risks to human rights, assisting when sharing with the wider business. Upon review of the matrix and following stakeholder feedback, three salient issues were selected based on both risk and prevalence. Also selected were two Unintended Consequences which run as overarching themes across the salient issues.
The salient risks identified are Health and Safety, Discrimination and Modern Slavery. The fact that modern slavery emerged as one of these salient issues further underpinned the importance of our commitment in this space. In being listed as a salient issue in our HRDD strategy, this functions as an awareness raising method within our own operations by bringing the topic into regular conversation within the wider ESG strategy.
In November 2023, the first Human Rights Due Diligence statement was published. The statement and subsequent updates are available on the Mi Hub website.

Managing Sector Risk

We recognise that the apparel sector which we operate in comes with inherent risks including but not limited to, a lack of transparency, gender-based discrimination and forced labour violations. We also acknowledge that our sourcing countries may come with their own specific risks, which are referenced in our 'Country Risk' section below. As mentioned above, our sourcing countries are China, Bangladesh, Sri Lanka, Cambodia, Mexico, Albania, India, Indonesia, Italy, Lithuania, Madagascar, Pakistan, Poland, Romania, Tunisia, Vietnam and the United Kingdom.

We operate a Risk Management Framework, which outlines our commitment, processes and methodology for identifying, assessing and mitigating risk. We have processes in place to assess risks at a corporate level, operationally and for project implementation.

We have a Corporate Risk Register to ensure we regularly review the changing risks in our industry, for the benefit of our customers, suppliers and our staff. Modern slavery is on the Corporate Risk Register and as such is actively discussed by both our Executive Leadership Team and our Audit and Risk Committee.

policy by way of a signature.

The main supply route for our production is from Bangladesh. Due to the high-risk nature of Bangladesh as a sourcing country, we have an office based in Dhaka with 25 employees who have a constant presence in our factories.

This allows for an enhanced due diligence approach in the region, with our colleagues able to work with our suppliers directly on any potential issues raised during the third-party audits. RSC (previously the Accord) scores are also reviewed as part of the on-boarding process for Bangladesh factories. Their presence also provides the opportunity for improved relationships which we hope will assist when implementing specific mitigation related projects in our human rights work over the next three years.

Country Risk

Mi Hub acknowledges the inherent risk that sourcing offshore in the garment sector can bring. We use the Sedex Country Risk Score to assess inherent risk of our sourcing countries, and to determine hotspots of risk which we need to focus on. We have incorporated this risk data into KPI information submitted to the Board every month to ensure the information is shared across the business.

As there have been a couple of changes to our sourcing countries, we have once again reviewed the Global Slavery Index. We assessed the risk to our sourcing regions against this dataset and found the results were the same. Two of our 17 sourcing countries are listed with a slavery prevalence of over 10, with no countries having a prevalence of under one.

Since the emergence of the human rights violations in the Xinjiang region of China, inclusive of the impacts within the cotton supply chain, we have implemented a Cotton Policy. All of our Tier 1 and 2 suppliers demonstrate commitment to the

Due Diligence and Remediation

Supplier Monitoring
Our current process of mapping our suppliers and deciding what level of monitoring is required is determined by the category in which the supplier falls in. We have five category classifications.

Category 1	Garment manufacturers we have a direct trading relationship with	Contact with the supplier is held directly with Mi Hub employees	Fully mapped
Category 2	Agents are the chain of communication between mi hub and the garment supplier	PO's are placed with the agent and they place orders in author-ised factories	Fully mapped
Category 3	Accessory suppliers	Trim and component suppliers who we buy from will now be included in their own tier	Partially mapped
Category 4	Fabric mills	Mills will now be split into their own tier to allow greater transparency and their own form of monitoring	Partially mapped
Category 5	Stockists	Provider of goods which are not made to order	Partially mapped

Category 1 and 2 suppliers are required to provide the same level of transparency. Site visits are conducted regularly by members of our Compliance, Sourcing, Purchasing or Product Development teams, inclusive of a walk-through audit which checks for key points in relation to ethical compliance. Key members of staff who regularly visit supplier sites have undergone certified audit training and all Mi Hub representatives conducting walk-through audits are provided with a checklist. Any issues detected are documented and followed up with a Corrective Action Plan by the Ethical Compliance team, to be completed within 30 days.

We utilize the Sedex Self-Assessment Questionnaire to gain initial insights into the business management systems of our suppliers and our requirement is that this gets updated by the site on an annual basis.

Sedex Members Ethical Trade Audits (SMETAs) are conducted by a third-party audit company on at least an annual basis. We recognise the limitations that audits provide when monitoring for modern slav- ery, however we use this as a benchmark tool and work with suppliers to develop their management systems and training programmes to help raise awareness, address and mitigate the potential issue of modern slavery and labour exploitation in our supply chain.

We audit on a semi-announced basis with our third-party audit company as we understand the limitations an unannounced audit can have on a supplier concerning the correct people present during an audit and all documentation being readily available for review.

Supplier On-Boarding

As part of our supplier onboarding strategy, which is managed by our Ethcial Compliance team, we have Tier specific onboarding requirements. Tier 1 and 2 suppliers receive a suit of documents explaining our ways of working and audit and monitoring requirements. Category 3, 4 and 5 suppliers are required to submit a Supplier Self Declaration form that details their processes and procedures relating to their supply chain monitoring.

Recruitment and preferred Supplier List

The business operates a Preferred Supplier List (PSL) for all recruitment agencies which is reviewed every three years. All agencies have provided confirmation of their adherence to the principles of the UK Modern Slavery Act 2015.

We audit recruiters on the PSL who currently have a turnover of more than £36 million in accordance with the Act. When recruiting individuals, we conduct the relevant Right to Work checks as detailed above in our Recruitment Policy.

Remediation

If modern slavery or labour exploitation is found in our supply chains or business, it is important that we treat each case individually. The first step would be to ensure the potential victim of modern slavery or labour exploitation is removed and protected from the situation and taken out of harm's way. If instances of modern slavery or labour exploitation were found in our business or operations in the UK, we would report to the authorities, with the victim's consent, and advise that we wish to refer the potential victim to the National Referral Mechanism. We would also report the incident to the Modern Slavery Helpline.

In our internal operations and within our supply chains, we would look to utilise our membership from the Slave-Free Alliance, who are experts in identifying victims of modern slavery and support in remediating and the development of remedial action plans. SFA in collaboration with Hope for Justice (its parent charity) can support in ensuring the victim is effectively identified and is safely removed from harm's way, whilst a plan of action is established to enable the victim to live free from modern slavery and exploitation.

Effectiveness/ Performance Indicators and Training

Collaborative Work

In January 2020, (Mi Hub) became members of the Slave-Free Alliance (SFA). We are very proud of the membership and the strong benefits it brings to us as a business. In our supply chain, we look to utilise our membership with SFA, who offer tailored and robust recommendations to build resilience to prevent those intending on exploiting others, and those exploited being placed within our legitimate operations and supply chains.

In November 2020, we took part in a gap analysis with the SFA who acted as our 'critical friend', discussing the ways in which we could continue our journey in addressing and mitigating the risk of modern slavery.
In subsequent years we have internally reviewed our progress on the results of this gap analysis, leading to a full joint review with SFA in 2023 where we collaboratively reviewed and assessed both our improvements and our revised focus areas based on the progress made since 2020.

During 2024/2025, we received responses from our top 20 core suppliers on the modern slavery questionnaire. From those results, the Slave-Free Alliance analyzed the data and provided guidance on how to interpret and prioritize the information and offer guidance on next steps. Using this data, we have followed up with suppliers on an individual basis on the SAQ process and the responses given and also made connections to other areas of our HRDD work.

Effectiveness/ Performance Indicators and Training

Performance Indicators in the Supply Chain

We track a range of ethical compliance performance indicators through a third-party reporting tool that allows us to produce KPI data from social audits, allowing us to easily identify factories that may require support or guidance. In addition to this, we will seek to utilise the aforementioned tool through the SFA to understand specific modern slavery information from our supply chain and set KPIs in relation to these.

Training

We have been members of the Ethical Trading Initiative for over 15 years and use our membership to drive sustainable change within our business and supply chain. We have partnered with the ETI to deliver training to our staff on the requirements of the modern slavery legislation and the signs they should look out for. The Slave Free Alliance also visited our offices to deliver more dedicated, in-depth training to our Supply Chain staff in order to detect modern slavery in the supply chain.

Additionally, all new starters are required to take a modern slavery awareness online learning course upon commencement of employment with Mi Hub. Staff can also re-access at their convenience to refresh their learning. Furthermore, our Ethical Compliance team regularly attend webinars and working groups with both the ETI and SFA to keep up to date with the latest information and risks regarding modern slavery.

Progress Against Key Focus Areas for 2024/2025

Create a documented Modern Slavery Escalation Policy.

Due to unforeseen circumstances, this has been delayed but will be worked on this year.

Deliver training to the Supply Chain Management Team on Modern Slavery and Factory visits.

Training has been delivered to Supply Chain on Modern Slavery and Factory visits/Walkthrough Audits.

Review the results of the Modern Slavery Questionnaire and implement a Beyond Auditing Program in a highlighted area of risk.

These results have been reviewed and an action plan created based on the results. This also forms part of our HRDD work where we go into more detail on this subject.

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dimensions affinity YAFFY Alexandra ALEX DIRECT

Key Focus Areas for 2025/2026

Create a documented Modern Slavery Escalation Policy.
Look to work with other areas of the business to deliver more in-depth Modern Slavery training.
Continue our work with the worker voice program and introduce additional factories into the program.

The board of directors of Measured Identity Hub Ltd delegated approval of this statement on its behalf to the Chief Executive Officer of the company.

Hayley Brooks
Chief Executive Officer
Measured Identity Hub Ltd

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