



# Modern Slavery Policy and Statement

## 1. Our Policy

MTR Group Limited is opposed to slavery and human trafficking in any part of our activities or our supply chains. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the period covered by this statement.

## 2. Our Business

We are a repairer and remanufacturer of mobile phones and tablets in the technology sector. Seasonal work is a feature of the industry in which we operate.

More information on our business is available at [www.mtr.co.uk](http://www.mtr.co.uk).

We are a part of the DCC Group. DCC is a leading international sales, marketing and support services group with a clear focus on performance and growth. Its headquarters are in Dublin, Ireland. It is listed on the London Stock Exchange and is a constituent of the FTSE 100 Index.

DCC currently has operations in 22 countries and employs over 16,000 people. Additional information on the Group is available at [www.dcc.ie](http://www.dcc.ie).

## 3. Organisational Structure and Supply Chains

Our business is organised into three main business units: Enterprise Repair, Supply and Trade In.

We purchase from and supply direct to the UK consumer. We offer warranty and non-warranty repair services on behalf of our business affiliate (Samsung) and we provide a trade-in service for consumer and B2B customers.

The large majority of the products we source are direct from the UK consumer or from reputable suppliers who are based in the UK and within the European Union.

We also occasionally source a number of products from suppliers in the following countries: USA and Hong Kong.

The following table contains a summary of the activities that we consider present the highest risk of slavery and human trafficking in the industries in which we operate, with, in each case, a summary of the steps we have in place to avoid these affecting our activities or our supply chains.

Industry Risk	Steps Taken
Conditions and treatment of workers in third party factories that supply MTR with technology products located in higher risk countries for slavery and poor working conditions and/or limited legal protections.	Any factory not meeting the standards set out in DCC Group policies and procedures (see further sections 4 and 5 below) automatically fail the criteria and we would not purchase products from the factory.

## 4. Policy in Relation to Slavery and Human Trafficking

The DCC Code of Conduct sets out our Group's commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specifically, Section 2 of the Code sets out our commitment to fair employment practices and Section 14 of the Code sets out our commitment to preventing, as far as practicable, slavery and human trafficking in our supply chains.

The DCC Group Supply Chain Integrity Policy sets out the approach taken by every business in the DCC Group to ensure that all the products we sell meet applicable legal and ethical standards.

In addition, the DCC Human Rights Policy sets out DCC's specific commitment to operate to internationally recognised standards of human rights, including in relation to forced labour, child labour and unsafe working conditions.

These documents are available at [www.dcc.ie](http://www.dcc.ie).

Our policy on slavery and human trafficking is set out in Section 1 of this statement.

The requirements of our Code of Conduct, Group Supply Chain Integrity Policy, Human Rights Policy and our own policy are reflected in the more detailed policies and procedures that we have in place in MTR Group Limited. These are addressed in more detail in Section 6 of this statement.

## 5. Due Dilligence and Assessing and Managing Risk

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

- Assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks;
- Monitor potential risk areas in our supply chains on a periodic basis.

## 6. Assurance and Key Performance Indicators

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the directors of MTR Group Limited.

We report on compliance with the DCC Group Code of Conduct and Supply Chain Integrity Policy every six months.

## 7. Training and Awareness

In the period covered by this statement 76 employees in our business completed online training on our Code of Conduct which covered the protection of human rights, including the prevention of slavery.

We also provide training to relevant employees on supply chain risks, including the risk of slavery and human trafficking at suitable intervals. Our participation in industry associations and our dealings with suppliers also provide information on where slavery and human trafficking risks may arise in the industries where we are active and best practice in avoiding them.

## 8. Nature of this Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2024.

This statement has been approved by the board of directors of MTR Group Limited



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James Goddard  
Managing Director  
MTR Group Limited  
03/06/2024