



Starin • 136 Venturi Drive • Chesterton, IN 46304 • 219-929-4127

Canada's Forced Labour and Child Labour in Canadian Supply Chains Act (Canadian law S-211) ("the Act") requires commercial organisations to publish a statement as to the actions they have taken to detect and deal with acts of forced labour or child labour in their businesses and supply chains.

This obligation applies to organisations that carry on business in the Canada and which have at least \$20 million in assets and revenue in excess of \$40 million worldwide.

This statement is therefore made by Starin Marketing Inc.

Starin Marketing Inc supports the objectives of the Forced Labour and Child Labour in Canadian Supply Chains Act (Canadian Law S-211) ("the Act") of eliminating forced labour and child labour and makes this statement pursuant to subsections 11(1) and 11(3) of the Act for the financial year ended 31 December 2023.



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ABOUT US

Starin Marketing Inc is a trade only distributor which means it acquires AV products from manufacturers and which it then sells to customers including AV integrators and IT resellers. These AV integrators and IT resellers then sell on to the end users operating in the corporate, events, government, education, retail, hospitality, healthcare, and residential markets. Starin enjoys long-standing relationships with over 50 world-wide, well-known manufacturers and a large and diverse base of resellers.

Starin Marketing Inc is headquartered in Chesterton, Indiana (USA) and wholly owned by Midwich Group plc in Norfolk, England which comprises a group of companies which specialise in audio visual distribution to the trade market. For the purposes of this statement, Starin Marketing Inc will be hereafter referred to as “Starin”.

We distribute product throughout the US and Canada and employ approximately 100 employees.

OUR COMMITMENT

Starin:

- acknowledges its responsibilities under the Act and is fully committed to preventing forced labour and child labour within its own businesses and in its supply chain,
- understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains,
- has a zero-tolerance policy towards forced labour and child labour. It will refrain from entering business, and/or will discontinue any current business with any other organisation, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

EXPOSURES AND RISKS

As the goods sold by Starin have already been manufactured by the time they pass into our ownership, Starin considers its exposure to forced and child labour to be limited and mainly relates to the working conditions and treatment of employees in the product supply chain, especially in higher risk countries.

Nonetheless, it has taken steps to ensure that such practices do not take place in its business. Starin works with its supply chain to endeavour that such practices do not take place in the business of any organisation that supplies goods and/or services to it.

In addition, Starin monitors its supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place in Starin's supply chain and/or businesses.

LABOUR PRACTICES

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the US to safeguard employees and apprentices from any abuse or coercion.

No labour provided to Starin in the pursuance of the provision of its own services is obtained by means of forced or child labour. Starin strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment law.

Part-time and fixed-term employees within Starin are generally provided with the same pro-rata contractual entitlements as full-time and permanent employees.

OUR BUSINESS RELATIONSHIPS

Starin has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with forced and/or child labour since the publication of the previous statement, there have been no reports that any of Starin's suppliers have been involved in activities covered by the Act.

RISK ASSESSMENT AND DUE DILIGENCE

Annual Review

Starin has begun the process of identifying risks, but there are still gaps in our assessments. We plan to conduct an annual review of the largest suppliers and customers to understand the information that they publish publicly on their websites and ask key suppliers to complete Forced and child labour questionnaires at regular intervals.

Operational Compliance

Starin annually reviews its operational compliance through the maintenance of risk registers and information gathering.

The leadership at Starin have regular updates with its parent company's Head of Tax, Treasury,

Compliance discuss how forced and/or child labour risks and concerns should be addressed.

Due Diligence

Starin conducts due diligence on suppliers, through credit and risk assessment, before allowing them to become a preferred supplier. Starin carries out an online search of suppliers (potential and existing) who fall within the realms of the Act, to ensure compliance and that there are no current cases of conviction for forced and/or child labour. Starin aims to have adequate contractual arrangements with respect to forced and/or child labour with all new suppliers.

POLICIES AND RESPONSIBILITY

Policies

Starin has implemented a Modern Slavery and Human Trafficking Policy (the “Policy”) which applies to all persons working for, on its behalf or with it in any capacity. The Policy reflects Starin’s commitment to acting ethically and with integrity in business relationships and to implementing and enforcing effective systems and controls, which is an extension of its company wide values.

In line with the above, Starin has a **Whistleblowing Policy** where employees can report concerns, suspicions or knowledge of misconduct or unethical behaviour in a secure and structured way.

Responsibility

The executive leadership team has an overall responsibility for ensuring the Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Starin’s Compliance team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering forced and/or child labour.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of forced and/or child labour in supply chains.

TRAINING

Starin’s employees have a responsibility to be alert to the risks of forced and/or child labour,



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however small, within both its business and the wider supply chain. They are required to report any concerns, using the appropriate reporting channels, and management are obliged to act upon them.

Starin, through its Whistleblowing policy, ensures that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that forced and/or child labour of whatever form, is, or may be taking place.

As part of an onboarding process, employees are made aware of Starin's Policy and other policies relating to standards of behaviour that it requires from them. Each employee must review, familiarise, and confirm that they have understood the Policy.

In the coming year, the onboarding process will include detailed training courses on forced and/or child labour and whistleblowing. The courses include attestations for employees to agree that they understood the training and the topics included. This ensures employees have a good understanding of forced and/or child labour and the risks it poses to our organization from the very beginning of their Starin career, as well as the options available via under the Whistleblowing legislation should they ever be required. Training on these topics will also be rolled out to all current US staff.

In the year ended 31 December 2023 the following actions took place:

- Training solution related to forced and/or child labour was identified.
- Continued focus on forced and/or child labour as part of the Starin's overall Environmental, Social and Governance framework

Further actions are planned in the year ending 31 December 2024:

- Implement training rollout to current and newly hired employees
- Detailed survey of key vendors
- Continue to work with vendors to understand their supply chain
- Revise any contractual clauses (if required)

This statement is made on behalf of Starin Marketing Inc.



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Approval for this statement

This statement is approved by the Corporate Officers of Starin Marketing Inc:

A handwritten signature in black ink that reads "Nick Parisi".

Nick Parisi
Chief Financial Officer
Starin Marketing Inc
May 2024