

## Modern Slavery and Human Trafficking Statement 2023

### 1. Introduction

This statement sets out the actions taken by the Gamma group's UK operating entities ("Gamma") to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or in its supply chains. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

As part of the electronic communications industry and as a company with a large number of employees, Gamma recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Further information on Gamma's operations can be found in our latest [Annual Report](#) and on our website: [www.gammagroup.co](http://www.gammagroup.co).

Gamma is committed to preventing slavery and human trafficking in its corporate activities and is aiming to ensure that its supply chains are free from slavery and human trafficking.

There were no instances of modern slavery or human trafficking concerns raised to us during the financial year ending 31 December 2023.

### 2. Statement Scope

This statement covers the activities of the Gamma group's UK operating entities, all of which are wholly owned subsidiaries of Gamma Communications plc: Gamma Telecom Holdings Limited, Gamma Telecom Ltd, Gamma Network Solutions Limited, Gamma Business Communications Limited and Mission Labs Limited. In addition, this statement also includes the entities Gamma Development Kft (Hungarian company) and Gamma Development Poland sp zoo (Polish company), both of which act as technical support centres for the UK operations and are subject to the same UK policies and procedures. While this statement does not cover other Gamma group's non-UK operating entities, Gamma Communications plc is committed to ensuring all its operating entities work to the same high standards and it has highlighted how its non-UK operating entities manage the required standards in the Annex to this statement.

### 3. Gamma People

- As a largely skilled workforce based solely in the UK the risk of modern slavery occurring in our direct operations is deemed to be low.
- Employees and contractors are subject to right-to-work checks.
- Gamma does not engage employees and contractors under the age of 18.

### 4. Gamma Services and Supply Chain

- Gamma provides electronic communications services (voice, data and mobile services) to business customers directly and through a network of channel partners.
- In order to provide its services, Gamma purchases electronic communications services, technology (software) services and licences, and electronic communications equipment and related software licences from third parties. Gamma also purchases products and services in connection with the general operation of its business.
- In relation to its supply chain, Gamma conducts a regular risk assessment of the different types of supply so as to identify where there is the greatest risk of modern slavery or human trafficking being involved. For instance, the supply of telecommunications software is considered low risk, while the supply of low-value equipment which may have been manufactured in low wage countries is considered relatively higher risk. The supply of materials and components by third parties to Gamma's suppliers or their suppliers further up the supply chain is considered high risk.
- Products and services purchased in connection with the general operation of its business are considered low risk.

### 5. Responsibility

Responsibility for Gamma's anti-slavery initiatives is as follows:

- Policies: the Board of Gamma Communications plc, the Chief People Officer and, in relation to Gamma's supply chain, the Group Procurement Director;

- Risk assessments: assessments are conducted by, in relation to recruitment, the People Team, and, in relation to Gamma's supply chain, procurement managers; and
- Investigations/due diligence: for recruitment related issues, the People Team and, for supply chain matters, procurement managers.

## **6. Relevant Policies**

Gamma operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Group Ethical Conduct Policy. Gamma requires employees and group companies to comply with local legislation. Gamma further expects all group employees and companies to meet the UK standard if it is higher than that imposed by local law; and to report internally so that Gamma can report appropriately for the group.
- Employee policies. Gamma's employment policies make clear to employees the actions and behaviour expected of them when representing Gamma. Gamma strives to maintain the highest standards of employee conduct and ethical behaviour.
- Ethical Procurement Policy. Gamma expects its suppliers to meet the principles outlined in the Ethical Procurement Policy. This means as a minimum complying with local laws and regulations and respecting internationally recognised human and labour rights, including the prevention of modern slavery.
- Recruitment/Agency workers policy. Gamma uses only specified, reputable employment agencies to source labour.
- Whistleblowing policy. Gamma encourages all its employees to report any concerns related to the direct activities, or the supply chain, of Gamma. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Gamma's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Gamma operates an independent whistleblowing service in conjunction with Safecall that allows its employees to contact an anonymous helpline and report suspected incidences of wrong-doing in our business, including modern slavery and human trafficking matters. The service has been communicated to all employees and is prominently displayed at all our sites. Any reports are thoroughly and independently investigated.

## **7. Due Diligence**

Gamma UK undertakes due diligence when considering taking on new suppliers, all of which are overseen by the procurement department, and regularly reviews its existing suppliers. Due diligence and reviews are undertaken using a third-party assessment and include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis the risk profile of each such supplier; and
- for the types of supply to Gamma UK considered at the higher end of the risk scale then Gamma requires evidence from the relevant suppliers that they have detailed written policies and effective procedures in place to control the risk of modern slavery and human trafficking in their own supply chains.

In 2023 Gamma reviewed its 100 top suppliers (60 in 2022), representing 93% of Gamma's suppliers by value (80% in 2022), of which 92% were deemed low risk with the remaining (8 suppliers) being deemed medium risk. No suppliers were deemed to be high risk. The suppliers were assessed based on the following criteria: industry type, likely nature of the workforce, supplier location, context in which the supplier operates, commodity type, and the business/supply chain model.

## **8. Effectiveness**

Gamma will promptly and thoroughly investigate any claim or indication that a supplier is engaging in human trafficking or modern slavery, or has not complied with the principles of our Ethical Procurement Policy. The whistleblowing service through Safecall supports our processes and we are pleased to report that no such reports of modern slavery or human trafficking have been made to this service since it was established.

## **9. Training**

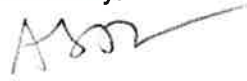
Gamma provided training on modern slavery obligations and their legal context to the Group Procurement Director during the financial year 2023.

In November 2023 Gamma provided modern slavery training to all its UK employees with the objective of ensuring employees are able to identify and avoid modern slavery incidents.

**10. Board Approval**

This statement was approved on 21 May 2024 by Gamma Communications plc's board of directors, who review and update it annually.

Director's signature:



Director's name: Andrew Belshaw, CEO

## **Annex to Modern Slavery and Human Trafficking Statement 2023 Non-UK Entities**

21 May 2024

### **1. Introduction**

Gamma has operations in different non-UK countries through its ownership of several local operating groups in each country:

- a) Netherlands: Gamma Communications Benelux BV and its subsidiaries ("**Gamma Netherlands**");
- b) Spain: Gamma Operadora de Comunicaciones SAU and its subsidiaries ("**Gamma Spain**"), including Voztelecom Maroc SARL (Moroccan company), which acts as a support centre for the Spanish operations and is subject to the same Spanish policies and procedures; and
- c) Germany: Gamma Holding GmbH and its subsidiaries ("**Gamma Germany**").

### **2. Modern Slavery Legislation**

The legislation in the three countries set out strong labour rights standards, including the prohibition of modern slavery and human trafficking, that are similar to those in the UK.

In particular, forced labour is a criminal offence in these countries as follows:

- a) Netherlands, Article 273f of the Dutch Criminal Code;
- b) Spain, Article 177b of the Spanish Criminal Code; and
- c) Germany, Section 232b of the German Criminal Code.

Further, the UK, Netherlands, Spain and Germany are all parties to the European Convention on Human Rights, which expressly prohibits slavery and forced labour in its Article 4, and to the Forced Labour Convention 1930 and the Abolition of Forced Labour Convention 1957 (both under the auspices of the International Labour Organisation).

### **3. Group Policy**

The Gamma Group Ethical Conduct Policy applies to all group operations. Certain jurisdictions have legislation and reporting requirements to prevent modern slavery and Gamma requires employees and group companies to comply with local legislation. Gamma further expects all group employees and companies to meet the UK standard if it is higher than that imposed by local law; and to report internally so that Gamma can report appropriately for the group. Gamma is pleased to report that no matters were brought to its attention in the year ended 31 December 2023.

### **4. Supply Chain**

The main suppliers to Gamma Netherlands, Gamma Spain and Gamma Germany are large enterprises (some of them multinational corporations) which are subject to local high mandatory social and ethical standards, including labour rights, that all companies must comply with. Hence the Gamma companies rely on these suppliers operating within their supply chain in accordance with their respective legislation on this subject. Where incidents of non-compliance are identified these will be communicated to the supplier for corrective action, as appropriate. There were no incidences of non-compliance identified during the year ended 31 December 2023.