

Modern Slavery and Human Trafficking Statement 2020

1. Introduction

This statement sets out the actions by Gamma Communications plc and its group of companies (“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 2020 to 31 December 2020.

As part of the electronic communications industry, Gamma recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

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

2. Organisational Structure, Statement Scope, Gamma Services and Supply Chain

2.1. Organisational Structure

During the financial year 2020 Gamma operated in the following countries:

- The United Kingdom, where Gamma has local personnel and a core network infrastructure through a number of operating subsidiaries listed in paragraph 2.2 below (“Gamma UK”);
- The Netherlands, where Gamma owns Gamma Communications Benelux BV (formerly known as DX Groep BV) and its subsidiaries, which do not form part of the Gamma UK business or supply chain; and
- The Republic of Ireland, where Gamma owns Gamma Communications Ireland Limited, which does not form part of Gamma UK business or supply chain;
- Hungary, where Gamma owns Gamma Development Kft, an IT development centre, which does not form part of Gamma UK business or supply chain;
- Spain, where Gamma owns VozTelecom Oigaa360 SA and its subsidiaries, which do not form part of the Gamma UK business or supply chain;
- Germany, where Gamma part owns HFO Holding GmbH and its subsidiaries, and fully owns gnTel GmbH and Telsis GmbH, none of which form part of the Gamma UK business or supply chain; and
- Poland, where Gamma owns Exactive Poland sp zoo, which does not form part of the Gamma UK business or supply chain.

2.2. Statement Scope

This statement covers the activities of Gamma Communications plc and its UK operating subsidiaries: Gamma Telecom Holding Limited, Gamma Telecom Ltd, Gamma Network Solutions Limited, Gamma Business Communications Limited, Telsis Communications Services Limited, Telsis Direct Limited, Telsis Services Limited and Exactive Limited.

2.3. Gamma Services and Supply Chain

- Gamma UK 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 UK purchases from third parties electronic communications services, technology (software) services and licences, and electronic communications equipment and related software licences.
- In relation to its supply chain, Gamma UK 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.

3. Responsibility

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

- Policies: the People Team and, in relation to Gamma UK’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 UK’s supply chain, procurement managers;

- Investigations/due diligence: for recruitment related issues, the People Team and, for supply chain matters, procurement managers;

4. Relevant Policies

Gamma UK 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:

- Whistleblowing policy. Gamma UK encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chain, of Gamma UK. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Gamma UK's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- Employee policies. Gamma UK's Employment Handbook code makes clear to employees the actions and behaviour expected of them when representing Gamma UK. Gamma UK strives to maintain the highest standards of employee conduct and ethical behaviour.
- Recruitment/Agency workers policy. Gamma uses only specified, reputable employment agencies to source labour.
- 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.

5. Due Diligence

Gamma UK undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Gamma UK's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new higher risk 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 requiring 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.

6. Performance Indicators

Gamma UK has evaluated all existing higher risk suppliers.

7. Training

Gamma UK did not provide training on modern slavery to its personnel during the financial year 2020.

8. Board Approval

This statement was approved on 27 May 2021 by Gamma Communications plc's board of directors, who review and update it annually.

Director's signature:



Director's name: Andrew Belshaw, CFO

Date: 25 June 2021