

Modern Slavery and Human Trafficking Statement 2021

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 2021 to 31 December 2021.

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 is aiming to ensure that its supply chains are free from slavery and human trafficking.

2. Statement Scope, Gamma Services and Supply Chain

2.1. Statement Scope

This statement covers the activities of the Gamma group's UK operating entities: Gamma Telecom Holdings 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. While this statement does not in 2022 cover other Gamma group entities, Gamma Communications plc is committed to ensuring that over time all its operating entities work to the same high standards and it expects to expand the scope of this statement each year until all operating entities are within scope.

2.2. 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 from third parties electronic communications services, technology (software) services and licences, and electronic communications equipment and related software licences. 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.

3. Responsibility

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

- Policies: 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.

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:

- Employee policies. Gamma's Employment Handbook code makes 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 workers, customers and other business partners 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 workers to make disclosures, without fear of retaliation. Customers or others who have concerns can complete our confidential disclosure form.

5. Due Diligence

Gamma UK undertakes due diligence when considering taking on new suppliers which fall within the remit of the procurement department, and regularly reviews its existing suppliers. Gamma'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 has evaluated all existing higher risk suppliers.

7. Training

Gamma provided training on modern slavery obligations and their legal context to the Group Procurement Director during the financial year 2021.

8. Board Approval

This statement was approved on 7 July 2022 by Gamma Communications plc's board of directors, who review and update it annually.

Director's signature:



Director's name: Bill Castell

Date: 14 July 2022