

## Modern slavery statement for 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that AdEPT Telecom plc (“AdEPT”) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. AdEPT has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

AdEPT is an independent telecommunications provider. The company offers a complete unified communications portfolio, including fixed line calls, line rental, mobile, data connectivity, hardware, managed services, WiFi, hosted and IP telephony and information technology (IT) services. AdEPT’s segments are fixed line services (being calls and line rental services) and managed services (which are data connectivity, hardware services, IP telephony, support and maintenance services). The company is engaged in the provision of voice and data communication services to both domestic and business customers. AdEPT provides unified communications solutions to commercial and public sector customers across the United Kingdom, offers technical and commercial options for onsite and cloud-based telephony.

### Our high risk areas

We have carefully considered all aspects of our supply chain, and given that they are UK based, committed to paying at least the national minimum wage (or living wage), we do not consider that we currently have any high risk areas. We shall continue to monitor the supply chain and all aspects of our business for any potential high risk areas and take appropriate steps to ensure that the supply chain ethics as set out in this statement are not compromised.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## Our suppliers

AdEPT operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery.

In addition to the above, we require that suppliers confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light

## Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## Approval for this statement

This statement was approved by the Board of Directors on 7 June 2018.

Name (Director): John Swaite

Signature:

