

Anti-Slavery Statement

From the Managing Director of Grayshott Gigabit Ltd

We are committed to improving our practices across the whole of our business to combat slavery and human trafficking.

Our Business, Structure and Operation

We are a telecommunication service provider supplying our services within the United Kingdom. We are based in Grayshott, Hampshire, working within a main Head Quartered Office, and from here, we can maintain vigilance on activities.

High-risk activities

We believe we have no activities in our business that are at high risk of slavery or human trafficking.

Our Supply Chains

Within our supply chain we use subcontractors to install and support services and telecommunication equipment manufacturers that supply the electronic equipment we need to deliver our services. The telecommunications networks interconnect to other networks as part of the supply chain.

Our policies on slavery and human trafficking

In line with our core company values we are committed to ensuring that there is no modern slavery or human trafficking within our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Grayshott Gigabit Ltd has created an effective Whistleblowing Policy and procedure which is available to all interested parties to take-up.

As part of our initiatives to identify and mitigate risk we undertake robust steps within due diligence conducted by our business to help combat slavery or human trafficking, which steps we outline below.

Recruitment

Our recruitment process includes robust controls to validate the ID of any prospective employees and ensure that they have full right to work documentation and relevant reference and background checks are carried out. Recruitment agencies, where used, are largely used from our Preferred Supplier list and are subject to full due diligence by the Procurement Team.

Supply Chain and Third Party referrals

To monitor compliance by our outsourced suppliers we require a Supplier Compliance Questionnaire to be satisfactorily completed before we engage with suppliers which includes an acknowledgment of a supplier's Modern Slavery legislative compliance. We expect all suppliers to behave ethically and treat all employees, customers and sub-contractors fairly and with respect.

Equality Act 2010 compliance – to protect against discrimination, harassment, and victimisation.

Suppliers should confirm compliance with all human rights and employment law in the jurisdictions in which they work which includes complying with the Modern Slavery Act 2015.

Grayshott Gigabit expects suppliers to adhere to anti-corruption laws, including but not limited to the Bribery Act 2010 and all applicable anti-money laundering regulations. By actively reviewing and engaging with our suppliers and their internal processes we commit to the following points:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers
- Training
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To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we commit to provide training to our staff. We also request our business partners to provide training to their staff and suppliers and providers.

Dated: February 2021