

## **Anti-Slavery and Human Trafficking Policy Statement**

### **Policy Statement**

Modern slavery is a crime. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business and to this end we are committed to developing and implementing and enforcing effective systems and controls.

### **Organisation Structure & Supply Chain**

Truphone directly employs in excess of 400 people across the globe and we engage with a range of suppliers. The supply chain for our core activities consists of established suppliers within the telecoms industry providing services such as network equipment, software, IT equipment, and consultancy services. Whilst always remaining vigilant we do not consider that there is a high risk of slavery and / or human trafficking in our business.

### **Responsibility**

Executive Management will implement this policy and monitor its use and effectiveness. Executive Management will ensure that our procurement processes are recognised, followed and will maintain appropriate steps to assure recognition of the *Modern Slavery Act 2015*.

### **Compliance with this Policy**

All those working for Truphone are required to avoid any activity that may lead to a breach of this policy and to report any concern or suspicion about modern slavery in any parts of our business or supply chains to management. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting a suspicion that modern slavery might be taking place.

### **Standards**

Truphone is developing a Supplier Code of Conduct that will contain clear standards and qualities that must be met by our suppliers and these will directly include reference to slavery and trafficking. This Supplier Code of Conduct will set out a number of principles to which suppliers are expected to comply including ethical standards encompassing slavery and human trafficking. Our contracts will, to the extent practicable, require that suppliers comply with our Supplier Code of Conduct and if there are reasonable grounds to believe that a supplier is at risk of being at odds with our Supplier Code of Conduct then those administering the contract will be required to terminate the contract in accordance with the existing contractual agreements.

### **Disciplinary Procedures**

Failure to observe this policy may result in the invoking of a written warning or dismissal. Serious offences may be reported to the police or other appropriate authority for further investigation and possible prosecution.

Date: 11<sup>th</sup> December 2019

Signed: .....