

# Modern Slavery Statement

In line with the requirements of the Modern Slavery Act 2015 (the “Act”), this statement outlines the steps Quickline Communications Limited (“Quickline”) has put in place to prevent any form of modern slavery from occurring within our business operations and supply chain.

## **Quickline’s organisational structure, its business and supply chains**

Quickline is a UK based and registered privately-owned limited company building fibre and wireless broadband infrastructure in the UK.

Quickline is not required to publish a statement under the Modern Slavery Act 2015 but is taking these steps to emphasise the importance we place on ensuring that neither slavery or human trafficking is taking place within our business or supply chain.

## **Quickline’s policies in relation to slavery and human trafficking**

Quickline and our partners are committed to treating everyone in our business and supply chain with dignity and respect. We recognise and take seriously our role in combatting coerced labour of any form in our supply chain and we work to ensure the well-being of the people who help to build our network and deliver services to our customers.

Quickline relies on several suppliers providing materials, technical equipment, managed services and contract resources. We recognise that modern slavery and human trafficking can be a risk across the global supply chain providing our materials and equipment. There are also risks in sourcing workers for our engineering deployment activities through sub-contractors. As such, Quickline’s suppliers and subcontractors must comply with relevant supplier requirements.

## **Quickline's due diligence processes in relation to slavery and human trafficking in its business and supply chains**

**Direct employees:** For all direct employees, Quickline undertakes full Right to Work checks in accordance with best practice and Government guidance. These checks include:

- At offer stage of any recruitment process full UK right to work checks are complete
- On the first day of employment, all right to work documents are checked and copies taken as appropriate.

Recruitment processes are transparent and comprehensive in terms of checks and balances.

**Suppliers and Subcontractor:** We have stringent supplier/subcontractor procurement processes in place across our business. All suppliers and subcontractors are the subject of comprehensive onboarding checks and, once onboarded, are required to comply with our Code of Conduct.

In respect of Modern Slavery, Section 7 of our Onboarding Questionnaire must be completed by all prospective suppliers/subcontractors and is checked by Quickline prior to appointment (See Appendix 1). As well as providing evidence of a Modern Slavery policy, our PQQ process requires suppliers/subcontractors to evidence how they audit their procedures to maintain ongoing compliance and to confirm that they conduct (and will continue to conduct) UK eligibility to work checks.

On appointment, all suppliers/subcontractors must sign and comply with our Code of Conduct which itself contains modern slavery requirements at principal subcontractor level and downstream. Please see Points 2 and 9 of our Code of Conduct (See Appendix 2). Our Master Services Agreement also contains commitments by each of our subcontractors to comply with the Modern Slavery Act 2015.

Auditing by Quickline's HSE Team and its civils and contract managers provides ongoing checks and balances and, in the event of a violation of our Code of Conduct or a breach of the Modern Slavery commitments under our Master Services Agreement, Quickline reserves the right to either terminate its relationship with the relevant

supplier/subcontractor or to work with the supplier/subcontractor to implement corrective action(s).

**Parts of Quickline’s business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.**

Quickline is alive to the fact that the construction industry, in particular, can present a risk in terms of slavery and human trafficking. This is why Quickline’s supplier and subcontractor procurement/onboarding processes and procedures are so comprehensive and why we require ongoing commitments from our suppliers and subcontractors through our Code of Conduct.

**Quickline’s effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.**

Quickline has a zero-tolerance policy to slavery and human trafficking. Our processes and procedures have, to date, ensured that we and our supply chain are consistent with our zero-incident approach. Such processes and procedures are reviewed on a regular basis against best practice and updated guidance.

**Training and capacity building about slavery and human trafficking are available to Quickline’s employees.**

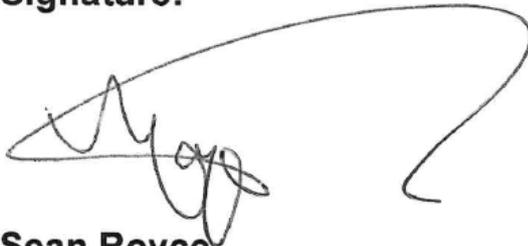
**Training:** To ensure awareness of this policy across our business, we provide training to employees that is commensurate with the level of risk.

**Reporting of concerns:** Quickline’s Suppliers, Subcontractors and employees are encouraged to report any concerns relating to issues covered by our Code of Conduct including concerns relating to slavery and human trafficking.

**Authorisation:** This statement has been signed by the Chief Executive and agreed by the Directors.

**Reviewed:** The statement will be reviewed and refreshed annually.

**Signature:**

A handwritten signature in black ink, appearing to read 'Sean Royce', with a large, sweeping flourish extending to the right.

**Sean Royce**

**Chief Executive Officer**

**On behalf of Quickline Communications Limited**