

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 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

This year, Truphone is developing its Aspiring Supplier Process that governs how we vet our suppliers and the relevant supplier questionnaires will directly include reference to slavery and trafficking. This supplier vetting will confirm how our suppliers comply with ethical standards encompassing slavery and human trafficking. In addition, our contracts will, to the extent practicable, require that suppliers comply with all relevant Truphone policies and if there are reasonable grounds to believe that a supplier is at risk of being at odds with our Truphone policies 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.


Jeremy Fletcher, Chairman

Date: 14th December 2021