

# Anti-Slavery and Human Trafficking Statement

Financial year end:	Year ending December 2024
Date published:	July 2025
Review date:	Annually

## Contents

1.	Introduction.....	2
2.	Organisational structure and supply chains.....	2
3.	Policies in relation to slavery and human trafficking.....	3
4.	Due diligence processes .....	4
5.	Training.....	5
6.	Continuous improvement.....	5

## 1. Introduction

This statement sets out Gigaclear's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

It continues to be a priority for Gigaclear to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

## 2. Organisational structure and supply chains

This statement covers the activities of Gigaclear Ltd (07476617).

Gigaclear is a broadband provider, delivering reliable, high-speed Fibre-To-The-Premises ("FTTP") fibre optic broadband networks in the rural communities in the UK ensuring connectivity across underserved communities. We currently operate solely in the UK and provide broadband services to over 150,000 customers.

Our business currently operates across the following UK-based business units:

HQ Abingdon	Building One, Wyndyke Furlong, Abingdon, OX14 1UQ
West Gloucester	Unit 21, Bamfurlong Industrial Park, Staverton, GL51 6SX
East Witham	Unit 2, Opus Business Park, Wheaton Road, Witham, CM8 3ZL
Swindon Stores	Unit 14, Euroway Industrial Estate, Frankland Road, Swindon, SN5 8YW

### Our supply chains

Gigaclear expects all our suppliers and supply chains to take all reasonable steps to comply with the **Modern Slavery Act 2015**. Predominantly, Gigaclear works with suppliers to support with the delivery of our fibre network. Our suppliers fall into two main categories:

#### 1) Build Suppliers

For the build and operation of our network, Gigaclear uses UK based contractors. Based on the risk assessments of our business activities, the higher risk areas for modern slavery are in the construction of our network, therefore the supply chain assessments for our build suppliers are more rigorous. Our supplier onboarding process requires our build contractors to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in the use of their labour. As part of our onboarding process, we utilise a HSEQ prequalification assessment for prospective Principal Contractors or Contractors wishing to work for Gigaclear to determine whether the applying organisation has

the appropriate HSEQ arrangements, resources, culture and capabilities to provide a robust and compliant service.

## 2) All Other Suppliers

Our wider supply chain is predominantly used for network materials, components, systems, and IT support. These suppliers come from both the UK and a wider geographical area. All our suppliers undergo an onboarding process and assessment. We contract on UK law, and we have contractual clauses to require our suppliers to adhere to the Modern Slavery Act.

The Gigaclear Legal team is responsible for adherence to the Modern Slavery Act 2015, working with colleagues across the business but particularly in HSEQ, Delivery and Procurement, aiming to ensure that we identify and appropriately deal with any modern slavery risk that might exist in our supply chains.

Responsibilities include:

- Ensuring adherence to the Modern Slavery Act.
- Setting and reviewing relevant policies and procedures.
- Carry out investigations in relation to known or suspected instances of slavery and human trafficking.
- Regular due diligence exercises in collaboration with our appointed solicitors, to identify areas for improvement in our policies and processes.
- Overseeing our commitment to and ongoing development of our Environmental, Social and Governance Strategy.
- Managing internal training in relation to 'Modern Slavery and Human Trafficking', supported by our internal training team.

## 3. Policies in relation to slavery and human trafficking

We operate the following policies and procedures that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Our **Modern Slavery and Human Trafficking 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.
- Our **Whistleblowing Policy** encourages a culture of openness to prevent malpractice before it happens. All employees and contractors are encouraged to report any concerns related to the direct activities, or the supply chains of, our organisation. The advice set out in the Whistleblowing Policy is designed to make it simple to raise a concern, without fear of retaliation.
- Our **Ethics Policy Statement** sets out the general principles to guide the organisation on Environmental, Social and Governance matters with the intention of creating Social Value where possible and creating a healthy working environment.

- Our **Anti-corruption and Bribery Policy** outlines Gigaclear's policies and procedures intended to ensure compliance with the UK's Bribery Act. The policy enables employees to recognise when issues arise; avoid prohibitive conduct where the issues are clear; and promptly seek guidance where they are not.
- Our **Procurement Policy** identifies the risks of modern slavery and areas of risk in our supply chains. The policy ensures effective governance and control of our procurement and supply management processes, ensuring they are carried out legally and ethically.
- **Recruitment:** Gigaclear uses only specified, reputable employment agencies to source labour and seeks to verify the practices of any new agency it is using prior to accepting resource from that agency. Verification is done through our supplier onboarding process where all supplier terms and policies are reviewed.

- **Procurement:**

Gigaclear has in place a supplier onboarding process, carried out pre-contract, where we request copies of our suppliers' relevant policies, processes and statements. Organisations that fail to meet our pre-contract requirements will be rejected.

Our principal contractors must sign and agree to our supplier terms including the **Contractors Code of Conduct**, which sets out the expectations of our suppliers, requiring them to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our Contractors Code of Conduct will lead to the termination of the business relationship.

Our contracts require all of our suppliers to:

- Comply with all applicable law relating to slavery including the Modern Slavery Act 2015.
- Have and maintain its own policies and procedures to ensure compliance with the applicable law and enforce them as appropriate.
- Comply with Gigaclear's Modern Slavery and Human Trafficking policies.
- Immediately report to Gigaclear in writing respect of any matter which could constitute a breach of Gigaclear's Modern Slavery and Human Trafficking Policy and/or the applicable law.
- Carry out all necessary background checks on any workers to ensure that they are not being exploited or trafficked in contravention of the applicable law.

All company policies are published to our employee SharePoint (intranet) and are reviewed/updated regularly.

#### 4. Due diligence processes

There are some sectors which are known be high risk; the nature of the activity attracts criminals who use all forms of slavery, labour exploitation and trafficking. One of these high-risk areas is construction and so we provide additional training for staff dealing with our build contractors such as those working in HSEQ and Delivery to increase awareness.

We undertake due diligence when considering taking on new suppliers, and the review of our existing suppliers. Our due diligence and reviews include:

- Using our supplier onboarding process to evaluate the modern slavery and human trafficking risks of new suppliers.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through HSEQ assessments and requiring them to implement action plans as required.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular. Gigaclear is a founding member of the SHiFT group (Safety & Health in Fibre Telecoms Group), which is a collective of fibre asset owners committed to improving health and safety standards within the fibre sector. The Group is committed to preventing harm or loss for those that work in the fibre sectors of may be affected by our operations, including the prevention of modern slavery and human trafficking risks.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Our **Contractors Rules and Requirements** document reinforces our build contractors' obligations in the area of modern slavery and exploitation. Our HSEQ Inspectors, Delivery Leads/Technicians and Quality Leads can inspect sites at random and can require our build contractors to evidence their policies and training. The checks that are done, along with other steps taken, help to ensure that workers employed in our works are free from exploitation and forced labour.

## 5. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all employees upon joining, and annual refresher training through our online Learning Management System. The mandatory training course raises awareness of the types of modern slavery, the key signs to look out for, and how to prevent it, tackle it and report it. This training covers our obligations under the Modern Slavery Act.

## 6. Continuous improvement

Gigaclear is committed to the continual review of our standards, to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

In 2024 our focus areas were the reviewing of our supply chain, as well as improving training and awareness across the business. Our Procurement team reviewed all procurement activities and published an accompanying policy to ensure appropriate governance and controls are in place when onboarding and renewing our suppliers. Our Project Delivery Leads (PDLs) have changed how their onsite time is split; with more time now spent with our contractor crews in order to build relationships. More frequent onsite presence helps establish trust between workers and allows our PDLs to make direct observations of any working conditions or behaviours which may be a cause for concern or requiring further investigation.

We were pleased to roll-out an updated modern slavery training module to all staff through our Learning Management System. The completion rate for this training stands at 96%. We are committed to the continual review of our internal training content, ensuring it is compliant, relevant and engaging.

Our areas of focus for this financial year (y/e December 2025) are as follows:

- Understanding and mapping our whole supply chain to assess geographical risks in relation to anti-slavery and human trafficking.
- Focus on transparency within our supply chain to better understand our supply chain to ensure we are sourcing ethically, as well as working and collaborating with our supply chain to understand best practice and share knowledge.
- Roll-out more extensive and business-specific modern slavery training for our Procurement and Commercial teams, who work closely with our suppliers, to allow better awareness and understanding.

This statement was approved on 21 July 2025 by Nathan Rundle on behalf of the Board of Directors of Gigaclear.

A handwritten signature in black ink, appearing to read "N. Rundle".

Signed by **Nathan Rundle** | Chief Executive Officer