

## **ANTI SLAVERY AND HUMAN TRAFFICKING POLICY**

### **Overview**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as, slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with any obligations we may have under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity including seconded workers, external consultants, third party representatives and business partners.

### **Policy Responsibility**

Our Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control, systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy, and are given adequate and regular training and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Officer.

### **Employee Responsibility**

All employees must read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The Compliance Office must be notified as soon as possible if an employee believes or suspects that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business, or supply chains of any supplier tier at the earliest possible stage. Any uncertainty about the act, or the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery and raise it with Our Compliance Officer.

If an employee believes or suspects any breach of this policy has occurred, or that it may occur, it should be reported in accordance with Our Whistleblowing Policy. It should be noted that where appropriate and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

### **Eclipse Broadband Ltd's Commitment**

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment due to reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment. A concern should be raised to the Compliance Officer, and where the matter is not resolved, the formal grievance procedure should be followed.

### **Communication and awareness of this policy**

Training on this policy and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breach of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.