

Sedcom Modern Slavery Policy

1 Introduction

This document sets out the framework applied by Sedcom Networks in relation to Modern Slavery

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 these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2 Statement of principles

This policy supports the core principles set out in Sedcom Networks Code of Business Conduct and Ethics.

Sedcom networks has a zero-tolerance approach to Modern Slavery. We are committed to:

- acting ethically and with integrity in all our business dealings and relationships;*
- 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;*
- ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains, consistent with our disclosure obligations under the relevant legislation.*

We expect the same high standards from all of our contractors, suppliers and other business partners and will include appropriate contractual provisions to ensure adherence to such requirements.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions or concerns in relation to Modern Slavery.

3 Scope

This policy applies to all persons working for Sedcom Networks or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party representatives.

This policy also applies to all relationships with our contractors, suppliers and other business partners.

4 Compliance with the Policy

All Sedcom Networks Staff employees, contractors, suppliers and business partners are required to 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, under our control or our business partners.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

5 Identifying and raising issues

You are encouraged to raise concerns or queries about this policy, or any issue or suspicion of Modern Slavery in any part of our business or our supply chains, at the earliest possible stage.

*If you believe or suspect that a conflict with or breach this policy has occurred, or may occur in the future, you must notify Sedcom Networks **as soon as possible***

Sedcom Networks staff should make contact with:

- *their manager;*
- *the Operations Manager*

External contractors, suppliers and business partners should make contact with:

- *their normal Sedcom Networks contact;*
- *the Operations Manager or*

Where appropriate, and with the welfare and safety of local workers as a priority, we may be able to give support and guidance to our suppliers.

6 Oversight of the Policy and its application

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Operations Manager has primary and day-to-day responsibility for this policy and to ensure its effectiveness in countering Modern Slavery. This includes:

- *effective communication and training;*
- *putting in place appropriate internal control systems and procedures;;*
- *monitoring and auditing the use and effectiveness of such controls; and*
- *dealing with any queries about the policy.*

Managers at all levels are responsible for ensuring that:

- *those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of Modern Slavery in supply chains; and*
- *external relationships are managed in accordance with this policy, including appropriate communication of this policy and monitoring of activities.*

7 Breaches 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.

8 Document and Policy Review

The policy will be reviewed annually by the Operations Manager and any material changes reported to the Board

We invite comment on this policy and suggested ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Operations Manager.