



Anti-Slavery and Human Trafficking Statement

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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 Limited (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 170,000 customers.

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

HQ <i>Abingdon</i>	Building One, Wyndyke Furlong, Abingdon, OX14 1UQ
East <i>Witham</i>	Unit 2, Opus Business Park, Wheaton Road, Witham, CM8 3ZL
Stores <i>Swindon</i>	Unit 14, Euroway Industrial Estate, Frankland Road, Swindon, SN5 8YW

3. 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:

a. Build and Install 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 contractor suppliers are more rigorous. Our supplier onboarding process requires our 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 assess whether the applying organisation has the



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

b. 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 Executive team is accountable for ensuring our adherence to the Modern Slavery Act 2015. The Gigaclear Legal and Procurement teams are responsible for setting policies and approach, working with colleagues across the business but particularly in HSEQ and Delivery, 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, 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.

4. 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 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.

5. Due diligence processes

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



We undertake due diligence both when onboarding new suppliers, and when reviewing our existing ones. Our due diligence and reviews include:

- Applying our supplier onboarding process to evaluate the modern slavery and human trafficking risks of new suppliers.
- Taking steps to improve substandard suppliers' practices, including offering guidance 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.

6. 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.

7. Continuous improvement

Gigaclear remains committed to continuous improvement in this area, regularly reviewing our processes, standards and supply chain practices to ensure we are taking sensible and pragmatic steps to detect and prevent modern slavery and human trafficking across our business.

Our areas of focus for this coming year (2026 and 2027) are as follows:

- Raw Material Sourcing & Supplier Audits – extending our review of supply chain commitments to focus on their own supply chain review and enhancing their frequency. The goal is to ensure our suppliers continue to meet their commitments, including those on ethical practices and human rights, and that risks are identified and addressed at every tier of our supply chain.
- Employee Awareness - Embedding a culture of awareness across the organisation by delivering targeted modern slavery training to key teams – including Procurement, HR, and



Field Operations. The goal is to ensure all staff can identify warning signs and know how to report concerns confidently and safely.

- Continuous Improvement - reviewing the effectiveness of existing whistleblowing channels, tracking incidents and near-misses, and using findings to continuously improve our policies and practices year on year.

This statement was approved on 28 July 2026 by the Board of Directors of Gigaclear.