

Modern Slavery and Human Trafficking Policy

May 2025



Background and introduction

This statement is made by Onecom Group Limited (“Onecom” or “we”, “us” and “our”) under section 54(1) of the Modern Slavery Act 2015, and constitutes our Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2024. Onecom Group Limited is the immediate parent company of Onecom Limited.

During 2024 we continued with our plans to better understand our supply chains, collaborate with stakeholders to improve transparency within our supply chains and strengthen our due diligence processes in the procurement of new suppliers.

Our business

We are an independent business telecoms and cloud communications provider delivering mobile, fixed line, hosted voice and unified communications, connectivity solutions, IT managed service and public, private and hybrid cloud services to approximately 70,000 customers.

Our head office is located in Hampshire and we operate a predominantly UK-wide network of regional offices and employ over 755 staff within the group.

Risk assessment

With office locations mainly in the UK and a predominantly UK supplier base, it is considered that the risk of modern slavery occurring within our own business or our supply chains is low. However, we respect human rights and remain alert to the possibility as we take any modern slavery risk very seriously.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We require all employees, officers, directors and consultants to comply with our anti-slavery and human trafficking policy. Our policy, which is reviewed annually, sets out the standards we expect of everyone working with us or on our behalf to support and uphold our policy commitments and it provides guidelines to report any suspicions or concerns relating to compliance with the policy.

As with all alleged violations of policy, Onecom would investigate issues and take appropriate action. During 2024 no slavery or trafficking concerns were reported.

Training

Training in relation to the Modern Slavery Act 2015 and slavery and trafficking risks is mandatory for all our staff and is completed on an annual basis.

We continue to raise awareness amongst relevant members of our organisation, specifically procurement and human resources functions, and ensure that our staff have the knowledge and skills they need to be able to identify potential issues and report any concerns, or breach of policy, to the relevant personnel.

We continue to promote wider awareness and understanding of modern slavery to our staff and our suppliers and undertake discussions as to the continued implementation of preventative measures including audit processes, improved policies and agreeing on the standards expected.

Our supply chains

Wherever possible, Onecom has, and continues to, develop strong, long-term relationships with its suppliers so that Onecom can work in partnership with its suppliers and provide the best possible service to its customers.

This year (2024) the role of Head of Product and Supplier Management further strengthened Onecom's relationships with its suppliers to ensure greater consistency of due diligence exercises during onboarding and throughout the contractual lifecycle.

Our operations teams manage our supply chains and continue to reinforce processes and procedures to help ensure that slavery and human trafficking is not taking place in our supply chains, which include the following:

- updating our contractual terms with our suppliers to include appropriate modern slavery provisions;
- regularly reviewing a Code of Conduct for Suppliers, which we require all suppliers to comply with and make available via the main Onecom website;
- carrying out due diligence on suppliers with regards to modern slavery during the onboarding process;
- requesting that suppliers provide, where appropriate, documentary evidence of their compliance with the Modern Slavery Act 2015; and
- continuing to enhance our supplier management capability to further strengthen our approach to ensuring transparency and minimising the risk of modern slavery within our supply chain.

Our progress

Since publication of our statement for the financial year ended 31 December 2024, we have continued to take steps to better understand our supply chains, collaborate with stakeholders to improve transparency within our supply chains and strengthen our due diligence processes in the procurement of new suppliers. In particular, Onecom:

- continues to focus on environmental, social and governance (ESG) management in order to ensure ongoing progress and commitment in these areas. Onecom's ESG committee meet on a quarterly basis to discuss progress and identify the areas of improvement;
- continues to be supported by a sustainability consultant to obtain expert advice in relation to Onecom's ESG improvement plan;
- publishes a statement on ESG management on its website detailing its objectives and its commitment to incorporating ESG considerations into business practices and decision-making procedures, link to be found at [Onecom | Environmental, Social & Governance Statement](#); and
- undertakes annual reviews of its slavery and human trafficking policy.

Next steps

Onecom is committed to better understanding its supply chains and collaborating with stakeholders to improve transparency and reduce the risk of slavery or human trafficking. We will:

- continue to enhance our supplier management capability and make further improvements to our supplier screening process;
- continue with the roll out of our supplier assurance questionnaire to allow consistent due diligence on critical suppliers across a range of issues including modern slavery compliance;
- continue to embed our Code of Conduct for Suppliers and our adopt a code of conduct setting out the behaviours and standards we expect of our suppliers (including compliance with modern slavery as well as other ethical business practices), which suppliers will be required to confirm adherence to as part of our onboarding process;
- continue to train staff annually on the issues and risks around modern slavery and human trafficking; and

- continue to review our approach to modern slavery to evaluate its effectiveness and identify any gaps.

Approval

This statement was approved by the board on 22nd May 2025.

Martin Flick, CEO