Contents

1. Modern Slavery Policy 2

1.1 Our Business and Supply Chain 2

2.1 Slavery and human trafficking 2

3.1 Employee Awareness Training 3

4.1 Due diligence processes 3

2. Document Information 4

1.2 Change Record 4

1. Modern Slavery Policy

The latest copy of Maintel Modern Slavery Policy is available on our website – www.maintel.co.uk
Direct link to policy:

https://www.maintel.co.uk/policies/modern-slavery-act-statement/

As a responsible and ethical business, Maintel has a zero-tolerance approach to all types of activities that pertain to slavery and human trafficking within our business and supply chains.

The Modern Slavery Act 2015 (the "Act") created offences in respect of slavery, servitude, forced or compulsory labour and human trafficking.

This is the Modern Slavery and Human Trafficking policy of the Maintel Group, consisting of Maintel Holdings Plc and its subsidiaries. It is made pursuant to s.54(1) of the Act and has been adopted by all companies in the Maintel Group as their respective slavery and human trafficking statement for the financial year ending 31 December 2023. In accordance with the requirements of the Act, the statement will be reviewed, updated, and published annually and will therefore be reviewed and updated at the end of each financial year.

1.1 Our Business and Supply Chain

Our business involves the supply, configuration, and support of telecommunications solutions worldwide and we had Group revenues of around £101m in 2023. We have around 450 employees, operating from 2 offices throughout the UK and one in the Republic of Ireland. Our supply chain therefore involves the sourcing, acquisition, and supply of telecommunications services, software, and hardware. It is far reaching and complex in nature, incorporating around 500 suppliers, most of which in turn will have their own suppliers.

Most of our purchases of goods and services are globally recognised brands that are supplied through distribution or reseller channels within the UK; however, many of the goods are likely to have been produced elsewhere with some of these countries potentially posing a greater risk than that present in the UK. Some suppliers, however, are local UK companies, and their own employment policies are also considered.

Respecting human rights and environmental issues in the supply chain is ultimately our suppliers' responsibility. We are, however, committed to operating our business ethically and with integrity, and so as customers we play an active role in monitoring them to ensure that they operate in an ethical and transparent manner.

2.1 Slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or elsewhere in our business. Should Maintel be made aware of any such practice it would act immediately and decisively to highlight and remedy it. Our anti-slavery position reflects our commitment to acting ethically and with integrity in all our business relationships. This is supported by our policies on bribery and corruption, and whistleblowing.

3.1 Employee Awareness Training

Maintel employees receive mandatory modern slavery training at induction and on an annual basis to assist in identifying and understand how to report any suspected modern slavery.

This is part of a wider set of mandatory training included within Maintel Competency, Training and Awareness Policy.

4.1 Due diligence processes

The directors of Maintel believe that the risk of it or any of its suppliers not adhering to the Act is small, but nevertheless has adopted the following processes as part of our initiative to identify and mitigate the risk:

- identify and assess potential risk areas in our supply chains.
- monitor potential risk areas in our supply chains.
- raise any concerns with suppliers with a view to obtaining comfort that they are adhering to our principles, failing which their contract would be terminated.
- protect whistle blowers.

In practice, this entails focussing on the larger suppliers to the Maintel Group, together with those which we consider having inherent risk.

Maintel relies initially on desk-based research to verify that its suppliers are themselves adhering to the provisions of the Act. It does so by:

- ensuring that its larger and higher risk suppliers display statements on their websites that they are complying with the Act or equivalent local legislation.
- writing to all suppliers asking them to confirm compliance.

Maintel has also developed standard contractual wording for inclusion in its supplier agreements where feasible to do so and has produced a Supplier Code of Conduct which is made available to all suppliers, and which sets out minimum requirements for our suppliers.

Our Modern Slavery Act Statement and Policy will continue to be reviewed and developed as part of the Company's regular Corporate Governance agenda.

This Statement has been approved on behalf of the board of Maintel Holdings Plc.

2. Document Information

Area	Information
Document Title	Modern Slavery Policy
Author	Legal Counsel
Process Owner	Legal Team
Date Created	30/01/2021
Date Approved	24/10/2024
Minor change approval by	Compliance Team
Substantial change approval by	Chief Financial Officer
Summary	How Maintel reviews and protects against modern slavery.
Classification	See footer
Reference	The Modern Slavery Act 2015
Associated Records	IMS Portal

This document is uncontrolled if any pages are printed, or it is downloaded.

1.2 Change Record

Latest Change Date	Detail	Re-approval required
24/10/2024	Upload to new logo and template	Provided