LEBARA GROUP – MODERN SLAVERY STATEMENT

Introduction

Lebara Group and its subsidiaries (Lebara) are committed to implementing practices to combat slavery and human trafficking. We intend that all companies in the group and all our employees ensure act responsibly, honestly and with integrity. We have a zero-tolerance stance towards modern slavery and human trafficking. Lebara complies with the laws and regulations of all countries in which it operates, including The Modern Slavery Act 2015. We aim to procure that any person, company or organisation with which we and/or which performs services on Lebara's behalf, commits to meeting the same standards.

Organisation's structure

Lebara is a provider of telecommunications services. The Group employs approximately 410 staff in six principal offices across our countries of operation.

Our business

We provide telecommunications services to our customers.

Our supply chains

Our supply chains include: supply of SIM cards, various methods for billing, top-ups and technical solutions for the provision of telecom services.

Our policies on slavery and human trafficking

We take steps to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships as well as implementing and enforcing effective systems and controls.

A copy of our Anti-Slavery Policy can be found *here*.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we:

- encourage our workers and business partners to report any concerns related to the direct activities or the supply chains of Lebara Mobile Limited which includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- our whistleblowing procedure is designed to make it easy for workers to make such disclosures, and without fear of retaliation.

LEBARA

Supplier adherence to our values

We have a zero policy tolerance towards slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we conduct a comprehensive due diligence exercise on each of our vendors:

a) as part of our supply chain evaluation, we verify that suppliers have a policy/statement that sets out the steps their organisation has taken during the financial year to ensure that slavery and human trafficking are not taking place in any of their supply chains or in any part of their own business.

b) If any potential supply chain partner is unable to demonstrate that they have a satisfactory policy in place, we contract that they commit to acting in accordance with our policy.

We understand that an Anti-slavery Policy and supplier due diligence questionnaire will not themselves be sufficient to prevent slavery and human trafficking.

Lebara recognises the importance of developing a culture within the company which does not tolerate slavery or human trafficking and is not complacent about the associated risks, therefore employees and individuals engaged by Lebara (e.g. contractors or consultants) are encouraged to play an active role in the continuous monitoring and review of Lebara's anti-slavery procedures either by submitting comments or raising queries to me as appropriate.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Lebara has a training programme for its staff focussing on awareness, to spotting relevant signs and risk areas throughout Lebara's everyday activities.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year between 1 January 2023 to 31 December 2023.

Approved by the Lebara Chief Legal Officer on behalf of the Board of Lebara Group BV on 6 March 2024.

Hugo Lindsay

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Chief Legal Officer

Date: 6 March 2024