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Modern Slavery Act Statement

GCX Topco Limited

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Document Version Control

Version	Release Date	Released By	Owner	Reviewer	Reviewed Date	Revision Details & Remarks	Approver	Approved Date
1.0	14.10.22	BB	HR	HR (AD/MU), LEGAL (LH, BB) PROCUREMENT (SC)	14.10.22-26.10.22	Final Draft	MU/ SC	26.10.22
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Errors and Omissions

When reading this document if you identify any errors or omissions, please advise GCX Human Resources ("**HR**") in writing giving a brief description of the problem, its location within the document and your contact details.

Communication of Updates/Enhancements

The current version of this statement is available on GCX's website and GCX's intranet site which is suitably protected for authenticated access only. Any changes to the statement should be communicated using the amendment control sheet above. Business Unit Heads and other stakeholders should review the amendment control sheets and should give feedback to GCX HR within a fortnight. After processing any feedback, the statement should be signed and approved and upgraded with the latest version.

This statement applies to all the employees, contractors, vendors and third parties to safeguard all the information assets of GCX and its subsidiaries.

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1. Introduction

We, GCX, are a global provider of data telecommunications managed services and subsea cabled telecommunications infrastructure capacity services. We are the parent company of the Vanco (data managed services) and Flag (subsea telecommunications capacity services) sub-groups of subsidiary companies. To find out more about our business please visit https://www.globalcloudxchange.com/

GCX has a zero-tolerance approach to modern slavery or human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to 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.

Modern slavery is a criminal offence under the UK Modern Slavery Act 2015 and is a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This commitment applies to all GCX Staff across all GCX subsidiaries located throughout the world.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the GCX Group's slavery and human trafficking statement for the financial year ending 31 March 2023 by GCX Topco Limited for an on behalf of all its subsidiary companies within the GCX Group.

2. Our Statement on Slavery and Human Trafficking

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

GCX does not tolerate any such activities and is committed to taking appropriate steps to ensure that everyone who works for GCX – in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected.

3. Supply Chain and Supplier Due Diligence

GCX is a global network services provider, and we procure a range of goods and services to meet our customers' needs. The majority of our external spend is with suppliers that provide us with network infrastructure, IT, and related services.

GCX aims to work with suppliers who support our efforts to source products and services responsibly. We aim to have a collaborative relationship with our suppliers and, wherever possible, will work with them when problems or issues arise to help them meet our business requirements. Our procurement processes and procedures require that an appropriate level of due diligence be conducted on prospective suppliers before they are appointed, or any expenditure is committed. The nature of the due diligence conducted is determined on a case-by-case basis.

GCX understands that it has a responsibility to continue to assess and mitigate the risk of modern slavery and human trafficking over the long term and during 2022/23 has made reasonable progress in its attempt to understand the nature of that risk, establish this statement and begin to implement controls to manage any risk that arises.

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4. Reporting a concern

Should any GCX Staff have any questions or concerns about this statement, or wish to make disclosures anonymously, they can be discussed with your manager, your Head of Department, any member of management, HR, or you can raise a report via the GCX "Speak Up Line".

Complaints will be treated in confidence and investigated, as appropriate. GCX Staff should also refer to our Whistleblowing Policy and Code of Conduct for more detail.

5. Updates

The management reserves the right to modify this statement at its discretion at any time without notice to you, so please check the intranet or GCX Website regularly to obtain the latest copy. This statement does not form part of any contract of employment or other contract to provide services and it does not override any applicable national laws and regulations in countries where GCX operates.

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 ending 31 March 2023. It was approved by the board of directors on 27th September 2023

signed by DocuSigned by: Carl Grivner

on 27 **September 2023**

Name: Carl Grivner

Position: Director