

Modern Slavery Act Statement

GCX Topco Limited

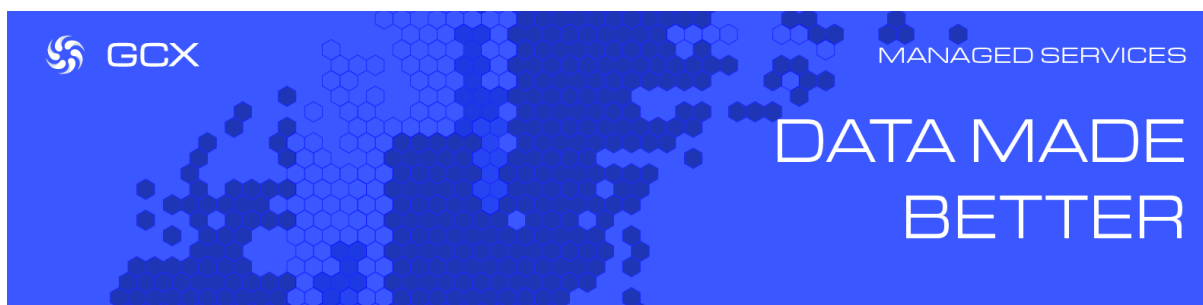
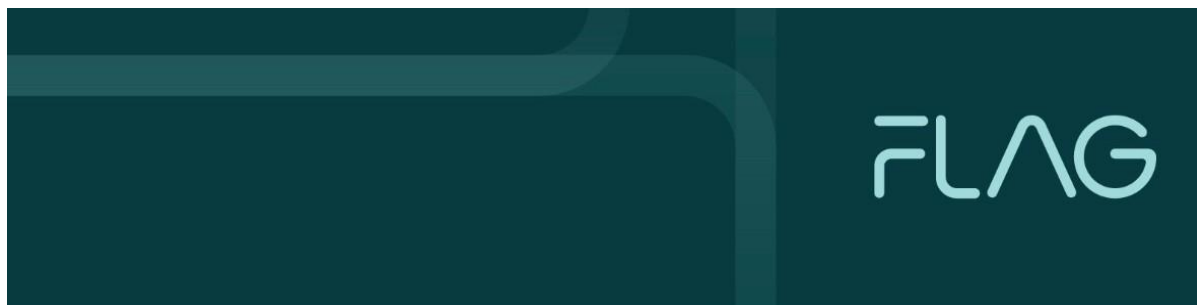




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Errors and Omissions

When reading this document if you identify any errors or omissions, please advise 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 the Flag and GCX websites and intranets, accessible only via authenticated login. Amendments must be recorded using the control sheet above. Business Unit Heads and relevant stakeholders should review and provide feedback to HR within two weeks. Following review, the statement should be signed, approved, and updated accordingly.

This statement applies to all employees, contractors, vendors, and third parties to ensure the protection of information assets across Flag, GCX, and their subsidiaries.

1. Introduction

FLAG and GCX are wholly owned subsidiaries of GCX Topco Limited. GCX provides global managed data telecommunications services, while FLAG offers subsea cable infrastructure capacity. For more information, visit <https://www.gcxworld.com> and <https://www.flagtel.com>.

We keep a zero-tolerance stance on modern slavery and human trafficking and are committed to ethical conduct and integrity across all operations and relationships. We enforce robust systems and controls to prevent modern slavery within our business and supply chains.

Modern slavery, a criminal offence under the UK Modern Slavery Act 2015, includes slavery, servitude, forced labour, and human trafficking—each involving exploitation through deprivation of liberty.

This commitment applies to all staff, contractors, vendors, and third parties across our global subsidiaries.

This statement is made subject to section 54(1) of the Modern Slavery Act 2015 and represents our slavery and human trafficking statement for the financial year ending 31 March 2026.

2. Our Statement on Slavery and Human Trafficking

We are committed to preventing modern slavery and human trafficking in all areas of our business and supply chains.

We have zero tolerance for such practices and take proactive steps to ensure that everyone working with us—globally and in any capacity—benefits from an environment where their rights and freedoms are respected.

3. Supply Chain and Supplier Due Diligence

As a global network services provider, we source a wide range of goods and services, with most external spend directed towards network infrastructure, IT, and related services.

We seek to work with suppliers who share our commitment to responsible sourcing and aim to maintain collaborative relationships, addressing issues constructively to meet business requirements.

Our procurement procedures require tailored due diligence for prospective suppliers prior to engagement or financial commitment. We provide Modern Slavery and Human Trafficking training as part of our Ethical Workplace training. This covers the requirement for third-party due diligence, indicators of forced labour and the reporting of concerns. Our procurement procedures require tailored due diligence for prospective suppliers prior to engagement or financial commitment. We also survey our top 20 suppliers on ESG matters, including modern slavery, to develop metrics and support improved supplier performance.



We recognise our ongoing responsibility to assess and mitigate the risk of modern slavery and human trafficking. In 2024/25, we made meaningful progress in understanding these risks, establishing this statement, and initiating control measures.

4. Reporting a concern

Staff with questions or concerns about this statement, or who wish to report issues anonymously, may speak with their manager, Head of Department, any member of management, HR, or use the “Speak Up Line.”

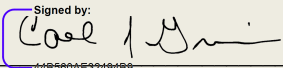
All reports will be treated confidentially and investigated as appropriate. Staff should also refer to the Whistleblowing Policy and Code of Conduct for further guidance.

5. Updates

Management may amend this statement at any time without prior notice. Please refer regularly to the intranet or the Flag and GCX websites for the latest version.

This statement does not form part of any employment or service contract and does not override applicable national laws or regulations in jurisdictions where Flag or GCX operate.

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 2026. It was approved by the board of directors on 28 September 2026.

Signed by: 
signed by 44B500AE32494B9
28-Sep-2026
on _____

Name: Carl Grivner
Position: Director