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This Statement applies to Seapeak Telecom Limited and its subsidiaries, Wavecrest Networks Limited, Wavecrest Innovations Limited and Wavecrest Communications France SAS (collectively known as Wavecrest). At Wavecrest, we are committed to running our business responsibly. We strive to maintain the highest ethical principles and to respect human rights. Our Company Handbook sets out the overall standards and commitments towards ethical conduct, anti-corruption and legal compliance. These standards extend to our suppliers, partners, agents, directors, employees and subcontractors.

Our Organisation and our Supply Chain

Wavecrest is a global telecommunications services provider, with over 60 employees inclusive. Wavecrest currently procures, manages and sells telecommunications services and products for a global market.

Our Stance on Modern Slavery

We have a zero tolerance to slavery and human trafficking. We will not tolerate any such activities within our own operations or within our supply chains and are committed to taking appropriate steps to ensure that everyone who works for Wavecrest — in any capacity, anywhere in the world — benefits from a working environment in which their fundamental rights and freedoms are respected.

Risk Assessment

Wavecrest undertakes due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chain. Wavecrest has not, to its knowledge, conducted any business with another organisation which has been found to be involved with modern slavery.

Monitoring, Compliance and Training

We aim to prevent modern slavery or human trafficking in our business right from the start of our on-boarding of new suppliers. Wherever possible, our contracts with suppliers contain the following clauses which require them to comply with applicable anti-slavery and related laws including the Act:

(a) In performing its obligations under the agreement, the supplier shall procure that its suppliers and subcontractors comply with all applicable anti-slavery and human trafficking laws, statutes and regulations from time to time in force including but not limited to the Act.

(b) The supplier shall implement an appropriate system of due diligence, audit and training to ensure that there is no slavery or human trafficking in its supply chains.

We aim to ensure an ongoing high level of understanding amongst our workforce of the risks of modern slavery and human trafficking in our supply chains and our business. Were we to identify any such acts we would take immediate steps to redress and report such matter with the utmost priority. We currently have a number of employee policies in place to support this aim. These are hosted in our Company Handbook (which is available to all employees via our HR portal); some of which are also referenced in employee contracts (where applicable). These policies include, but are not limited to:

- Anti-Bribery
- Anti-Slavery and Human Trafficking
- Whistle Blowing
- Equal Opportunities

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- Anti-Harassment and Bullying
- Grievance

Our internal policies are reviewed in order to address modern slavery issues; and all workers and contractors undertake internal training as part of their on-boarding process to ensure the risks relating to modern slavery and human trafficking are understood and mitigated. All workers are provided with the details of our whistle blowing hotline to which they can make disclosures anonymously.

Evaluating our Progress

Our activities are evaluated annually to reflect our commitment to the prevention of modern slavery and human trafficking. We will also annually analyse the various parts of our business, to reassess risks and ensure our risk management is adequate. This statement is made pursuant to section 54(1) of the Modern Slavery Act and constitutes the slavery and human trafficking statement for Seapeak Telecom Limited and its subsidiaries for the financial year ending 31st March 2024, and has been approved by the Board of Seapeak Telecom Limited. Geoff Lockwood, Chairman, September 2024.

