



# Wifinity Modern Slavery Statement

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| <b>Current Version</b>                     | V2.0                                                                                                 |
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| <b>Document Owner(s)</b>                   | Chief of Staff – Rosie Briercliffe<br>Head of Legal – James Cowan<br>Head of HR – Charlotte Bennison |
| <b>Sensitivity Classification</b>          | Public                                                                                               |

## Document History

| Version Number | Date         | Comments                       | Created, reviewed or updated by                                                |
|----------------|--------------|--------------------------------|--------------------------------------------------------------------------------|
| V1.0           | 6 March 2026 | First version                  | Created by:<br>Rosie Briercliffe – Chief of Staff                              |
| V1.0           | 9 March 2026 | Review                         | Reviewed by:<br>James Cowan – Head of Legal<br>Charlotte Bennison – Head of HR |
| V2.0           | 26 May 2025  | Updated following board review | Updated by:<br>Rosie Briercliffe – Chief of Staff                              |

All queries or proposals for amendments to this document should be addressed to the following

| Name & Role                        | Contact Details                  |
|------------------------------------|----------------------------------|
| Rosie Briercliffe – Chief of Staff | Rosie.briercliffe@wifinity.co.uk |

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Wifinity Limited's slavery and human trafficking statement for the financial year ending 31st December 2025. The statement will be updated annually within 6 months of the financial year end.



## Introduction

This statement applies to Wifinity Limited (referred to in this statement as 'Wifinity'). The information included in this statement refers to the financial year 1 January – 31 December 2025.

Wifinity is a UK-based managed internet provider, delivering B2C & B2B connectivity solutions for organisations and their customers. Wifinity operates across multiple Public and Private sectors, supporting business and consumer communities throughout the United Kingdom. Wifinity takes its responsibilities as an ethical business seriously, and are committed to the highest standards of integrity, transparency and professionalism for the benefit of its employees, supply chains and customers. Wifinity has a zero-tolerance approach to human rights abuses. Slavery, child labour and human trafficking has no place anywhere in its business or supply chains.

## Definitions

Wifinity considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

## Commitment

Wifinity strictly prohibits the use of modern slavery and human trafficking in its operations and supply chain. Wifinity acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015.

Wifinity does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Wifinity in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Wifinity strictly adheres to the standards required in relation to its responsibilities under relevant employment legislation within the United Kingdom.

Wifinity upholds the following measures to safeguard against modern slavery:

- Wifinity has a zero-tolerance approach to modern slavery in its organisation and supply chains
- Wifinity understands that the prevention, detection and reporting of modern slavery in any part of Wifinity or supply chain is the responsibility of all those working for Wifinity, or on its behalf.
- Wifinity's workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy or the Modern Slavery Act 2015
- Wifinity is committed to engaging with its customers, stakeholders and suppliers to address the risk of modern slavery in its operations and supply chain
- Through its internal risk assessments and due diligence processes Wifinity may require:



- Employment and recruitment agencies and other third parties supplying workers to confirm their compliance with its policy
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to its policy
- As part of ongoing risk assessments and due diligence processes, if Wifinity finds that other individuals or organisations working on its behalf have breached this policy or the Modern Slavery Act 2015, Wifinity will ensure that appropriate action is taken. This may range from considering the possibility of any breaches being remediated to terminating any such relationships and making the relevant reports and declarations to authorities.

This policy can be found on our website - [Anti Slavery Policy - Wifinity](#)

## Organisational Structure

### Wifinity's Culture and Values

Wifinity understands the importance of operating as a responsible and ethical business, as can be seen in our Customer commitment on our website [About Us - Wifinity](#). This includes clear commitments to fair and ethical working practices and safe working conditions for all employees and partners.

Our commitment is underpinned by our company Values which all employees and partners are expected to adhere to;

- **Make it Happen** – Own it. Do it right. Make it stick.
- **Everyone Together** – Being diverse makes us stronger
- **Service First** – Deliver great service so we all succeed
- **High Standards** – Do what we say and keep raising the bar

These Values are baked into Wifinity's performance management and employee recognition processes, as well as day to day processes and decision making.

### Wifinity's Organisation

Wifinity designs, builds and manages business-critical connectivity infrastructure for complex, multi-site, multi-tenant environments. Wifinity provides connectivity and internet services to the below sectors to the Defence & Public Sector and the Private Sector.

More information about Wifinity's services in these sectors can be found on the website [Ultrafast Broadband | High-Performance WiFi | Business Networks | Wifinity](#)

Whilst some sectors such as Holiday Parks & Leisure may experience seasonal trends, the overall operations and activities of the business are not seasonal and are busy year-round.

All operations are based within the United Kingdom and Wifinity has office locations within the Greater London area. Wifinity is a hybrid working business which means that staff may work from home; the office locations; or from one of Wifinity's customer sites.

Wifinity provides hardware and services on a limited basis internationally. For example, to its Offshore customers, to vessels that operate across the globe and, to its Holiday Park & Leisure customers, to locations in mainland Europe. However, Wifinity does not have international offices and only sends its staff overseas in limited circumstances.



Certain back-office tasks such as finance administration and software development are completed by a limited number of outsourced resources based in South Africa, Serbia, Slovenia, and Ukraine. Outsource partners are considered part of the supply chain, and are subject to Wifinity's Modern Slavery policy, due diligence and management processes, as described below. There is full separation of development and production environments for this resource and any access to production environments is restricted to specific troubleshooting exercises, restricted to senior staff, and audited.

All employees must provide the relevant right to work documentation, which is reviewed and verified by the Human Resources team, prior to employment commencing. Wifinity do not currently directly employ temporary or self-employed workers outside of the UK.

## Supply Chain structure

Wifinity actively seeks to work with suppliers and third parties that share its values and commitments. To fulfil its activities, Wifinity's supply chain includes those related to:

- The procurement of hardware for the purpose of installing networks i.e. access points, switches, cabling;
- The procurement of connectivity backhaul which Wifinity procures from providers and manages on behalf of its end customer;
- The procurement of key software packages for critical operational processes, such as CRM and Network Monitoring Systems
- The procurement of third-party contractor resource to support Wifinity teams with the installation of network hardware on site

Wherever possible, Wifinity works directly with suppliers who demonstrate ethical practices, commitments, and have demonstrable modern slavery commitments. Wifinity understands that some of its first-tier suppliers are intermediary traders and have sub-contract relationships with lower-tier suppliers.

Due to varying customer requirements, Wifinity includes appropriate Supplier Codes of Conduct and KPIs in supplier contracts, tailored to the relevant sectors, markets and sites. This may include requirements such as security clearance and/or DBS (UK Government Disclosure and Barring Service) checks where necessary.

Additionally, all suppliers are required to complete and countersign onboarding questionnaires confirming the supplier organisation has:

- investigated its labour practices and those of its direct suppliers to ensure that there is no slavery or forced labour in use anywhere in its organisation or supply chain;
- implemented all necessary processes, procedures, investigations and compliance systems to ensure this applies throughout the relationship with Wifinity.

These declarations are reviewed for completeness and accuracy by Wifinity's Senior Operations Manager overseen by Wifinity's Chief Operating Officer (COO), and approved by Wifinity's Head of Legal.

This statement forms part of a wider supplier questionnaire which must be reviewed and re-signed by each supplier annually and is then reviewed and approved by Wifinity as per the above process.

Any suppliers found to be non-compliant may be subject to immediate remediation and sanctions, including the suspension or termination of the commercial relationship until compliance is achieved.



## Organisational policies

Wifinity expects its employees and suppliers to adhere to its company values, which guide our conduct, activities and actions: Make it Happen, Everyone Together, Service First and High Standards (MESH). These values underpin Wifinity's culture.

Wifinity has policies that support the identification, prevention and escalation of Modern Slavery risks within its organisation and its supply chain..

All relevant policies and documentation are provided to new starters as part of onboarding and are accessible to all employees via Wifinity's intranet.

**Employee Handbook** – describes MESH; expected code of conduct; the rights of all employees around fair working practices; fair pay; and company policies. It also sets out the positive behaviours expected of all employees, particularly around treating everyone with dignity and respect.

**Employee Health & Safety Handbook** – describes Wifinity's health & safety commitments and what employees can expect from Wifinity as an employer, including employee rights to work within a safe environment. It also sets out policies & procedures and explains how employees can raise health and safety concerns.

**Whistleblowing Policy** – describes Wifinity's commitment to transparency and accountability. Provides guidance on how employees can raise concerns without fear of reprisal, and Wifinity's approach when a concern is raised.

**Anti-Bribery and Corruption Policy** – describes Wifinity's zero tolerance approach, across all employees and the supply chain, to corruption, bribery, any unethical, dishonest, harmful or illegal acts and behaviours.

**Bullying & Harassment Policy** – describes Wifinity's expectations regarding the conduct of employees and suppliers acting on its behalf. It clearly explains the types of controlling, abusive, harassing, threatening or otherwise harmful behaviour that may result in sanctions against individuals and organisations.

**Equal Opportunities Policy** – describes Wifinity's commitment to providing a workforce that is representative of all sections of society, and to maintaining a safe, positive environment in which all employees are recognised, valued and treated fairly. It also describes Wifinity's commitment to fair and ethical recruitment practices, and the processes in place to support these.

**Modern Slavery Policy** – describes Wifinity's zero-tolerance approach to modern slavery. Directs employees to Wifinity's modern slavery statement and describes the steps taken by the organisation. This policy will be published alongside this statement.

## Assessing and Managing Risk

Wifinity assesses modern slavery risks across its operations and supply chain as part of our Corporate Risk Management process.

While Wifinity considers its exposure to Modern Slavery to be low due to our UK-based model, it recognises that potential vulnerabilities exist in its supply chain. These risks are assessed alongside wider ESG-related risks and inform mitigation measures, including supplier due diligence, safeguarding processes and whistleblowing mechanisms.



## Due Diligence and steps taken

Wifinity carries out due diligence processes to prevent slavery and human trafficking within its organisation and supply chains, including reviewing supplier controls.

- Wifinity maintains a public-facing Modern Slavery Policy on its website, and all employees are made aware of Wifinity's zero-tolerance approach and their obligations under relevant policies and procedures. Supplier compliance is reviewed annually.
- All suppliers are assessed for appropriate controls and required to confirm their own due diligence to eradicate modern slavery within their businesses and supply chains.
- Modern slavery risks are recorded on Wifinity's corporate risk register and reviewed at Executive level on a quarterly basis to ensure appropriate management and mitigation.
- While Wifinity considers the risk of modern slavery within its business to be low, it will continue to operate proactively and, where possible, work with suppliers operating in areas assessed as low risk.

## Training

Wifinity ensures that all employees are made aware of its zero-tolerance approach to modern slavery through:

- Onboarding training on company policies, the Employee Handbook, the Health & Safety Handbook and the Company Values, including employee obligations. All new employees are required to read and understand these policies and procedures:
- Employees have ongoing access to all training materials, codes of conduct, handbooks, policies and procedures via the company-wide intranet:
- Wifinity leadership teams ensuring all policies and procedures are adhered to by employees and suppliers, and any non-conformity is managed and resolved as soon as possible, which may include additional or refresher training where required:

## Monitoring and evaluation

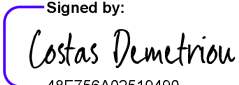
Wifinity has not, to its knowledge, conducted business with any organisation found to be involved in modern slavery.

Wifinity recognises the importance of continually assessing the effectiveness of its actions to address modern slavery risks, and monitors the following key indicators:

- **Supply Chain management** - evaluating suppliers' modern slavery risks during onboarding and requiring annual confirmation of compliance across the supply chain.
- **Risk Management** – maintaining a low risk of modern slavery through proactive risk assessment and management, under the governance of Wifinity's Executive team
- **Training, policies and procedures** – monitoring compliance with, and effectiveness of, relevant policies and procedures across Wifinity and supply chain
- **Continuous improvement** – ongoing review of Wifinity's internal due diligence and risk management procedures to identify and address opportunities for improvement.



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Signed  Signed by:  
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Costas Demetriou, CEO