

Modern Slavery Statement

Introduction

This statement sets out the actions that Netceed UK Limited (“the Company”) take to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2024 to 31 December 2024.

The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Company Structure

The Company is a distributor of IP infrastructure to both the carrier and enterprise markets. It operates predominantly in the United Kingdom.

Company Policy on slavery and human trafficking

As part of the Company’s due diligence processes into slavery and human trafficking, the supplier approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/ and human trafficking issues. The level of management control required for these sources will be continually monitored.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the Company’s HR department upon request.

This policy statement will be reviewed annually and published.

This policy takes into account, and supports, the policies, procedures and requirements documented in our Management System, aligned with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all



levels of the Company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Company's activities.

Responsibilities

The Finance and HR Director has responsibility for oversight of Modern Slavery at Netceed, including implementation and periodic review of our Modern Slavery policy statement.

This Policy will be reviewed annually and through changing needs, industry standards and legislation. The Policy will be communicated to all employees on Company induction and will be communicated as part of site inductions to all those working on behalf of Netceed Ltd. Re issue of this Policy will occur when changes have been made and on annual review to all relevant interested parties.

The Modern Slavery policy statement is owned by the Finance and HR Director.

Robert Tamburrini

Finance and HR Director

02/01/2025