

Modern Slavery Statement FY22

Policy statement

Neos Networks' Modern Slavery Statement ('the Statement') is responding to the requirements of the Modern Slavery Act 2015 ('the Act'). This Statement is made pursuant to section 54(6) of the Act and constitutes Neos Networks' slavery and human trafficking Statement for the financial year ending on 31 March 2022.

Neos Networks has zero tolerance of modern slavery in all its

forms and has a responsibility to understand the risks within its own business and supply chain, ensuring ongoing management of those risks. We support and are fully committed to upholding the UN Guiding Principles on Business and Human Rights, the aims of the UN Sustainable Development Goals, and the principles underpinning the UN Global Compact.

Direct workforce

Everyone that works for Neos Networks is formally based in the UK. As of 31 March 2022, we had 600 direct employees who work across a number of offices, depots and operational sites in the UK.

Given the nature of our business and operations, our workforce tends to be highly skilled with employment terms and conditions to match. At 31 March 2022, our employees had an average length of service of 6 years, 96% of our direct workers are on permanent contracts.

Contingent workforce

On 31 March 2022 we had a contingent labour force of 66 people. These are people who are not directly employed by the company but carry out work using our IT systems and/or on our premises as consultants, temporary agency workers and contractors.

Supply chain workforce

80% of Neos Networks spend through its supply chain is with our top 25 suppliers with 15 being over £5M each.

The nature of our business means that it is involved in several large infrastructure projects as well as operations at different stages during a given year – from pre-planning and design, to development, planning and operation. This means that the type and volume of goods and services we purchase can vary significantly, for example from small items of technical equipment to technology systems and on-site civils works across multiple sites facilitating a wide spectrum of annual spend.

We will continue to monitor our supply chain and will reassess policies annually to ensure that it is continuing to meet our organisational values





Policies and standards

Neos Networks has a framework of policies and standards that provide the values base from which Neos Networks' approach to ethical business and employment practices, and specifically human rights, is governed. The below documents have all been reviewed and refreshed for FY22, ensure that they are up-to-date with current and emerging issues; align with our agreed purpose and refocused strategy and our newly established values.

- **Doing The Right Thing:** A guide to ethical business conduct for employees sets out the behaviours and principles of behaviour at Neos Networks, and enshrines our "Speak Up" approach, which supports employees to be able to speak up and report any wrongdoing, including within our supply chain.
- **Human Rights Policy:** Describes the company's approach to being responsible to its employees and people employed in its supply chain.
- **Safety and Health Policy:** Outlines Neos Networks commitment to the prevention of injury and ill health associated with its activities.
- **Employment Policy:** Underpins our commitment to being a responsible employer.
- **Ethical Business Policy:** Summarises the company's commitment to financial integrity and ethical behaviour, including anti-bribery & corruption.
- **Procurement Policy:** Communicates our approach to responsible procurement, including sustainable and ethical supply chains and modern slavery risk.
- **Our Supplier Charter:** Describes the approach the business takes to managing modern slavery in its supply chain and sets out its expectations of its supply chain partners.

Responsible employer ethos

Neos Networks have a well-established responsible employer ethos, which focuses on developing our workforce from within, limiting out-sourcing where possible, and creating an inclusive culture where employees are treated with fairness and respect.

Verification and vetting

We ensure that the right to work is evidenced for all workers in line with government requirements. We also set the expectation that contractors and staffing agencies are subject to the same standards, assigning business managers with responsibility to ensure they are satisfied that the required verification and vetting of workers has taken place.

Living Wage

Neos Networks is a Living Wage employer. Checks are carried out by payroll every month to ensure that we will remain compliant with our own voluntary commitment to paying the real Living Wage.

All supply chain workers that work regularly on our sites must also receive at least the real Living Wage rate. Whistleblowing channels exist for any supplier or contractor to contact us if they believe they should be receiving the Living Wage and are not.

Training and awareness raising

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided webinars to the Business in FY22 and we have agreed with HR to include an induction course in FY23.



Our Supplier Charter includes a requirement that suppliers and contractors provide a channel for people to speak up if they suspect modern slavery or human rights abuses when working on behalf of Neos Networks

Channels for speaking up

Individuals can speak up about incidents or suspected incidents of wrongdoing at Neos Networks through both internal and external 'Speak Up' whistleblowing channels, with reports able to be made anonymously through our externally hosted speak up channel, Safecall. When incidents are reported, either internally or externally, they are referred to HR and / or Legal and each case is fully investigated. Any person working for us, whether they are directly employed by us, or employed to work on one of our sites, can use our whistleblowing channels.

This statement was approved by the Neos Networks' management team on 29th September 2022.

This statement sets out the steps taken by Neos Networks between 1 April 2021 and 31 March 2022 to identify and prevent modern slavery and human trafficking existing within its business and supply chains.

Name :Position: Signature: Date:

Name: Colin Sempill

Position: CEO

Signature: 

Date: 29th September 2022



About Neos Networks

Neos Networks provides class-leading connectivity and data centre services that deliver very high performance, cost efficiency and a competitive edge.

The company operates a 34,000km private telecoms network and an estate of 90 commercial data centres that span the UK. With its extensive telecoms and data centre operational expertise it offers commercial security with unrivalled in-house engineering resource.

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