

ANNUAL STATEMENT ON MODERN SLAVERY

MBNL MODERN SLAVERY STATEMENT – 2024 FINANCIAL YEAR

MOBILE BROADBAND NETWORK LIMITED ("MBNL") is a 50:50 joint venture between EE Limited ("EE") and Hutchison 3G (UK) Limited ("**Three**"). We are responsible for the end-to-end management of our Shareholders' (EE and Three) shared network infrastructure. MBNL is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and its supply chain, and we see that commitment as a key part of its broader social responsibility commitments.

We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

In accordance with Section 54 of the Modern Slavery Act 2015, this statement sets out the steps MBNL has taken during the 2024 financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and any part of its own business. In March 2025 the UK Government published updated guidance on the reporting obligations set out in the Modern Slavery Act 2015. Though the updates do not change existing law, MBNL will seek to align with the updated guidance when reviewing and reporting on its anti-slavery activities in future reporting periods.

In addition to this statement for MBNL, each of our Shareholders publishes its own statement, which can be found on their respective websites.

Supply Chains

We manage a large number of strategic suppliers providing a variety of services. The majority of our suppliers are UK-based, but some have manufacturing facilities in other locations (such as Asia) and other suppliers have operational support centres in countries such as India. We work closely with our strategic suppliers to foster more meaningful relationships with them, to exert closer control over the relationship and to ensure they understand how our business must operate. We expect all our suppliers and business partners to conduct their business in a lawful and ethical manner, which includes adopting business practices that prevent or eliminate modern slavery and human trafficking within their onward supply chains.

During 2024, additional assurance activities for suppliers were considered to further protect workers and identify any areas of improvement. These activities focused on health and safety and quality procedures. Following this review, work began to implement a new supply chain software assurance tool which is being rolled out in 2025, as described below. In 2024 a key part of MBNL's health and safety improvement programme was the successful delivery of ISO Health and Safety Management Systems (ISO 45001), which achieved accreditation at the end of 2024.

Due Diligence Processes

Prior to a supplier being engaged they will undergo our first contact process which includes a pre-qualification questionnaire ('PQQ') and financial check. Within the PQQ we review:

- information about the supplier's approach to corporate social responsibility;
- copies of their modern slavery transparency statements (where applicable); and
- details of policies on fair sourcing of goods and services.

We use third party tools to carry out screening of our suppliers both pre-and post-contract award, and utilise Dun & Bradstreet's Risk Analytics tool to track sanctions and modern slavery.

All new suppliers are required to provide assurance during the pre-qualification process that they:

- will comply with the Modern Slavery Act 2015; and
- have not committed, nor are they under investigation or prosecution in relation to, any modern slavery or human trafficking offences.

We also include our standard modern slavery compliance clauses in all contract extensions / renewals.

We assess our suppliers' approach and commitment to eradicating modern slavery during our contract assurance process, including a review of their modern slavery transparency statement (where applicable) and statements and policies supplied in response to pre-qualification questionnaires.

In 2025 we will be rolling out a new supply chain software assurance tool, Achilles. Achilles plays a crucial role in the PQQ process by ensuring ethical supply chain practices are assessed. The PQQ process promotes transparency and enables MBNL to assess suppliers' commitment to ethical business practices before engagement, reducing the likelihood of inadvertently supporting exploitative practices.

The Common Assessment Standard (CAS) to which MBNL suppliers will be assessed has extensive questions around modern slavery so suppliers can demonstrate their compliance to modern slavery requirements by providing a modern slavery statement.

Through its platform, Achilles also provides training, resources, and best practice guidance, helping suppliers improve their compliance with anti-slavery legislation such as the UK Modern Slavery Act. By embedding modern slavery criteria into the PQQ process, the use of Achilles means that MBNL can ensure ethical considerations are prioritised from the outset, driving long-term change in supply chains. This proactive approach not only protects vulnerable workers but can also enhance corporate reputation and contribute to the reduction of legal and financial risks.

Our aim for 2025 is to complete the system rollout of Achilles and the subsequent onboarding of all suppliers by the end of the year.

Risk Assessment and Management

We have implemented a framework that incorporates industry best practice across the service and contract lifecycles from supplier selection to exit management. Our in-life management methodology has been rolled out to all Tier One suppliers and will be followed by a rollout to all other tiers. A significant element of our commercial framework relates to the identification of compliance risk (including in relation to modern slavery and human trafficking).

By integrating modern slavery compliance checks into the supplier PQQ process, the implementation of our new assurance tool Achilles will help MBNL to identify and mitigate risks early.

Training

All new and existing members of staff are required to complete mandatory online compliance training. This training includes a module on modern slavery and updates our staff on modern slavery legislation and its requirements. We aim to update this training annually and all members of staff, both new and existing, are required to log in and complete this compliance assessment annually. We review who has completed and passed the assessment through MBNL's Training Academy app and statistics are reported to and monitored by the Audit and Risk Committee.

Policies

MBNL has published its modern slavery policy which states our zero tolerance to Modern Slavery in our organisation, ecosystem and in our supply chains, our commitment to prevent and eradicate modern slavery and our approach to the assessment and management of any such risks on an on-going basis. The policy was reviewed in 2024.

MBNL operates a confidential whistleblowing service for the entire organisation, operating 24 hours a day, 365 days a year. We use a whistleblowing service, Navex EthicsPoint, in order to provide an effective whistleblowing platform. We have a whistleblowing policy (which was reviewed in 2024) and regularly remind staff of the availability of the platform using a variety of media. The platform is outsourced to a third party to maintain the independence of the resource and encourage workers to 'speak up' about unethical practices or behaviours. Where any instance of unlawful or unethical conduct is reported on the platform, then it will be reported to and investigated by our Head of Legal (Commercial and Governance) or our Director of HSQE and People.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Mobile Broadband Network Limited's modern slavery and human trafficking statement for the financial year commencing 1 January 2024 and ending 31 December 2024.

This statement was approved by the MBNL Board of Directors on 20 June 2025.

Signature:



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Gervase King
MBNL Managing Director

Date: 20 . 06 . 2025