

## Modern Slavery and Human Trafficking Statement (2024)

### Introduction

This statement is made pursuant following section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that Focus Group and affiliated companies has taken, and is continuing to take, to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain.

Focus Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard any form of modern slavery taking place within the business or our supply chain.

### Our Business and Structure

We are a leading UK communications service provider with a portfolio of divisions including Voice, Mobile, IT, Data, Media, Print, Security and Energy. We employ over 1000 staff across the UK and have an annual turnover in excess of £210m. We are an equal opportunities employer, committed to creating and ensuring a non-discriminatory, inclusive and respectful working environment for all employees. We are committed to fair employment practices and to following all applicable employment laws as a minimum.

### Our Supply Chains

Our supply chains provide us with telecommunication equipment. We seek to develop and sustain on-going trusted relationships with our suppliers and working with integrity is at the forefront of these relationships. We ensure that all our suppliers provide us with a modern slavery and human trafficking statement.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

### Our Policies

We operate a number of internal policies to ensure we are conducting business in an ethical and transparent manner. These policies set out the standards required of our employees and include details of the processes in place which can be used to report any issues or concerns about Modern Slavery linked to Focus Group taking place.

These include:

- 1. Recruitment Policy** - We have a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- 2. Whistleblowing Policy** - We operate a whistleblowing policy so all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- 3. Code of Business Conduct** - This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## **Our Suppliers, Due Diligence Processes, Risk Assessment and Management**

Focus Group conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. We may terminate the contract at any time should any instances of modern slavery come to light.

## **Training**

Focus Group also conducts a range of training initiatives including, but not limited to, an in induction for new employees, in addition to sharing our policies for review and employee agreement that covers our general rules, and the importance of acting with integrity in line with our core Company values.

## **Our Performance Indicators**

Focus Group has not received any concerns, feedback or reports to indicate that modern slavery and/or human trafficking is taking place within our business or supply chains from employees, customers, members of the public or law enforcement agencies. We are satisfied this provides a reasonable indication in relation to the effectiveness of our practises and procedures.

We will continue to diligently review all available indicators in order to ensure Focus Group and our supply chains remain free of modern slavery and/or human trafficking.