



## MBNL MODERN SLAVERY STATEMENT – 2019 FINANCIAL YEAR

**MOBILE BROADBAND NETWORK LIMITED ("MBNL")** is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and its supply chain. MBNL sees that commitment as a key part of its broader social responsibility commitments.

In accordance with s.54 of the Modern Slavery Act 2015 this statement sets out the steps MBNL has taken during the 2019 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.

### MBNL STRUCTURE AND ORGANISATION

1. MBNL is a 50:50 joint venture between EE Limited ("EE") and Hutchison 3G (UK) Limited ("Three") and being a trusted and credible partner to two of the UK's most recognisable and innovative mobile operators is at the heart of everything we do. In addition to this statement for MBNL, each of our Shareholders publishes its own statement, which can be found on their website. For more information about our structure and our Shareholders please click on the following links:

<http://mbnl.co.uk/our-shareholders/>

<http://mbnl.co.uk/about-us/>

2. MBNL is UK headquartered in Reading and is an organisation of approximately 370 people. We are responsible for running the Radio Access Network ("RAN") for EE and Three throughout the UK. We manage the equipment and software in the RAN, and so are also responsible for the purchase and deployment of equipment and software to support the network, which also includes negotiating the terms of the commercial contracts for the procurement of the supply and support of such equipment, software and related services.

### THE NATURE OF OUR SUPPLY CHAIN

3. Our supply chain is made of a variety of third parties who help us deliver on our responsibilities to our Shareholders.
4. We manage a large number of strategic suppliers providing managed services, network equipment, transmission, information technology and management of power and property supplies. Most of these suppliers are UK based, but some of them have manufacturing facilities in other locations (such as Asia), and other suppliers have operational support centres in countries such as India.
5. We work closely with our strategic suppliers in order to foster more meaningful relationships with them, exert closer control over the relationship and ensure they understand how our business (and the RAN) 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.

## **SUPPLIER MANAGEMENT**

### **Development of our Supplier Management Programme**

6. We have developed a supplier management programme. The focus of this programme is on contract management, performance management, risk management and relationship management.
7. Whilst much of the focus of this programme is in relation to ongoing contract management in order to drive better performance from our suppliers, this also enables us to be more in tune with our suppliers, and therefore more alive to any potential risk of modern slavery occurring within our supply chain. There is also a significant element of the supplier management programme which relates to identification of compliance risk (including in relation to modern slavery and human trafficking). Prior to a supplier being awarded a contract they will undergo a risk assessment, and whilst all our suppliers are expected to comply with all local and national laws and regulations, as part of this risk assessment we will also ask for (and 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.

8. We score suppliers based on their approach and commitment to eradicating modern slavery and this is based upon a review of their modern slavery transparency statement (where applicable). Where we determine that a supplier does not meet our high standards in relation to ethics we will:
  - ensure individual legal review of the information received from the suppliers; and
  - if we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 we would require the supplier to provide a remediation plan and we would consider the future of our relationship.

### **Application of our Supplier Management Programme**

9. We successfully rolled out our supplier management programme to our top three suppliers by spend (which together equates to approximately 75% of our annual spend).

We focused on the next tier of suppliers, with a focus on our principal contractors in the acquisition, design and construction area.

### **Vendor Assessment (Tools & Service)**

10. In October 2018, we successfully sourced a third-party supply chain/vendor assessment tool and service (Market Dojo) which enables us to carry out screening of our suppliers both pre- and post-contract award (thereby enabling us to audit each supplier during the term of their contract with us with a view to ensuring continuous compliance). This tool and service focuses on several financial metrics and flags whether a supplier is "high risk" from a compliance perspective, including in relation to modern slavery and human trafficking offences.

11. The Market Dojo tool provides reports to review on our supplier base. The key benefits to this tool are fourfold:
1. Ability to assess and monitor MBNL's supplier base;
  2. Planned periodic checks to review supplier insurance policies, security accreditation and compliance with UK legislation, such as the Modern Slavery Act 2015 and the Bribery Act 2010 and ensure that suppliers adhere to contractual requirements (such as H&S, QA, GDPR);
  3. Provide a tool to measure financial risk; and
  4. Monitor suppliers' approach to Corporate Social Responsibility
12. In 2019 we collated the data generated through Market Dojo to enable us to understand the extent to which our suppliers are compliant with the Act and to determine what, if any, action we wish to take.
13. We will continue to develop a dashboard for each of our suppliers which will contain a flag on modern slavery and human trafficking compliance. The tool or service will then give us a clearer indication of suppliers with whom we do not want to do business with.

## **CONTRACTING**

14. Since 2018 all our standard contracts and all new suppliers are required to provide contractual assurances that they:
- (a) will comply with the Modern Slavery Act 2015; and
  - (b) 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.

15. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains, and if we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 we would require the relevant supplier to provide a remediation plan and we would consider terminating our relationship should we see no substantial improvement in this area.
16. All our existing suppliers have been informed in writing of our expectation that they will adhere to these same standards in relation to modern slavery and human trafficking. We received no objections from those suppliers.

## **TRAINING**

17. All new and existing members of staff are required to complete mandatory online compliance training. This training includes a module and updates our staff on modern slavery legislation and its requirements. We aim to update this training annually and all members of staff will be expected

to complete it each year. We have created an app called the MBNL Academy which contains several useful items for our staff, amongst which is the online compliance module, which has recently been updated. The app launched in early 2019, following which all staff, both new and existing are required to log in and complete this compliance assessment in 2019. We review who has completed and passed the assessment through MBNL's Training Academy app.

18. Members of the procurement team who are Chartered Institute of Procurement and Supply (CIPS) accredited are encouraged to take the Ethical Procurement and Supply e-learning and online test offered by CIPS. This course is designed to help procurement and supply chain professionals to demonstrate their commitment to, and understanding of, acting ethically on behalf of their organisations

## **WHISTLEBLOWING**

19. We implemented a whistleblowing hotline in August 2016. This is a global, confidential hotline, web reporting and email service for the entire organisation, 24 hours a day, 365 days a year.
20. The hotline is outsourced to a third party to maintain the independence of the resource and encourage employees to 'speak up' about unethical practices or behaviours.
21. We also have the capability to extend the service free of charge to any number of our third-party suppliers, so they are able to encourage their personnel to utilise this service as well in order to report any instances of modern slavery or human trafficking occurring within our supply chain, or any other concerns they may have in that regard.
22. Where any instances of unlawful or unethical conduct is reported to the hotline then it will be reported to our General Counsel for review. We received no calls to the hotline during the 2019 financial year.

## **POLICY**

23. Whilst MBNL does not currently have a specific modern slavery policy, we assess and manage any such risks on an on-going basis, and we are committed to internal accountability standards and procedures for employees or contractors failing to meet our standards regarding modern slavery and human trafficking. We implemented a broader social responsibility policy in 2018 (focussed on the following three key areas this year: (a) volunteering, (b) matching charity donations; and (c) payroll giving).

In 2020 we intend to draft and publish our Modern Slavery Policy in consultation with both Shareholders.

## **SIGN OFF**

24. 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 2019 and ending 31 December 2019.

This statement was approved by the MBNL Board of Directors on 20 March 2020.

Signature:

*Pat Coxen*

**Pat Coxen**

Managing Director

**MOBILE BROADBAND NETWORK  
LIMITED**

Date: 9.4.2020

Signature:

*Patrick Binchy*

**Patrick Binchy**

Chairman of the MBNL Board 2019

**MOBILE BROADBAND NETWORK  
LIMITED**

Date: 9.4.2020

