



MBNL MODERN SLAVERY STATEMENT – 2021 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 2021 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/>

MBNL is UK headquartered in Reading and is an organisation of approximately [419] workers.

2. We announced our transition to a service based operating model at the end of September 2020, responsible for the end-to-end management of our Shareholders' (EE and Three) towers and network; transmission, and infrastructure deployment. We are focused on delivering the right customer experiences, safely and securely at the right cost; the management of all aspects of the Passive infrastructure estate to provide the capability that underpins the delivery of our Shareholders' customer experiences; the design, planning, deployment and intelligent maintenance of our transmission operations; and driving the build of strategic infrastructure solutions supporting the long-term requirements of our Shareholders in a cost-effective way.

THE NATURE OF OUR SUPPLY CHAIN

3. Our supply chain is made up of a variety of third parties who help us deliver on our responsibilities to our Shareholders; supplier management is an integral part of our role and key to our success.
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 to foster more meaningful relationships with them, to exert closer control over the relationship and to 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.



6. In 2021 we conducted a due diligence exercise to map MBNL's supply chain ecosystem to provide a holistic view of MBNL's supply chain. We reviewed our pre-qualification process and added the following additional checks:
 - a. Added another layer of approvals to the vendor assessment process; and
 - b. Completed an assurance exercise on all Modern Slavery Statements on relevant and active suppliers.

SUPPLIER MANAGEMENT

7. During 2021 the Commercial directorate was formed to combine all the procurement, portfolio, supplier and contract management activity. To ensure continuity across our supplier base this new Commercial area is implementing a framework that incorporates industry best practise across the service and contract lifecycles. This framework contains the following processes:
 - Supplier Selection
 - Contracting
 - On-boarding
 - In-life Management
 - Exit Management
 - Supplier Strategy
8. The focus of our In-Life management methodology is on contract management, performance management, risk management, finance management and relationship management.
9. Whilst much of the focus of this methodology 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 methodology which relates to the identification of compliance risk (including in relation to modern slavery and human trafficking). Prior to a supplier being engaged they will undergo our first contact process which includes 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.
10. We review 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 Supplier Management

11. We are currently rolling out this new framework to all tier 1 suppliers, and all tier 1 suppliers are actively managed with the In-life Management methodology. As this embeds through 2022, then we will look to roll out to the remaining tiers.

Vendor Assessment (Tools & Service)

12. We use two third party tools 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). These tools focus on several metrics and flags whether a supplier is "high risk" from a compliance perspective, including in relation to modern slavery and human trafficking offences.
13. The Market Dojo tool provides reports to review our supplier base. The key benefits to this tool are:
 1. The 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); and
 3. The ability to monitor suppliers' approach to Corporate Social Responsibility.
 4. 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.
14. In 2021 MBNL contracted with Dun & Bradstreet to use their financial checking tool to ensure there is a robust check and continuous monitoring of our supplier base and their financial health.

CONTRACTING

15. All our standard contracts and all new suppliers are required to provide contractual assurances 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.

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

17. 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

18. 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, 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.
19. Members of the Commercial team at MBNL 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

20. In 2020 we updated our whistleblowing platform: this is a confidential web reporting and email service for the entire organisation, operating 24 hours a day, 365 days a year. We have put in place a programme to communicate and remind staff of the availability of the platform and have refreshed our whistleblowing policy accordingly.
21. 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.
22. Where any instance of unlawful or unethical conduct is reported on the platform, then it will be reported to and investigated by our General Counsel.

POLICY

23. MBNL published its Modern Slavery policy in 2021. The policy 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.

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 2021 and ending 31 December 2021.

This statement was approved by the MBNL Board of Directors on 17 June 2022.



Signature:
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Patrick Binchy.....
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Patrick Binchy

MBNL Board Director 2022

**MOBILE BROADBAND NETWORK
LIMITED**

Date: [28 June 2022](#)

Signature:
DocuSigned by:
Davinder Rai.....
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Davinder Rai

Chair of the MBNL Board 2022

**MOBILE BROADBAND NETWORK
LIMITED**

Date: [28 June 2022](#)