



## MBNL MODERN SLAVERY STATEMENT – 2022 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 s.54 of the Modern Slavery Act 2015, this statement sets out the steps MBNL has taken during the 2022 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 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.

### Due Diligence Processes

Prior to a supplier being engaged they will undergo our first contact process which includes a pre-qualification questionnaire and financial check. Within the pre-qualification questionnaire 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 during 2022 we also approved the implementation of the Moody's Compliance Catalyst 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 include assessment of 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.



## 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 the supplier management methodology relates to the identification of compliance risk (including in relation to modern slavery and human trafficking).

## Training

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 and statistics are 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.

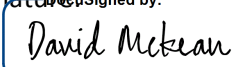
MBNL operates a confidential whistleblowing service for the entire organisation, operating 24 hours a day, 365 days a year. We have a whistleblowing policy and regularly remind staff of the availability of the platform using a variety of media. The platform is outsourced to a third party to maintain 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).

In order to continue to improve our approach to tackling modern slavery, we have identified a key action for f/y 2023 to complete the roll-out of the Moody's Compliance Catalyst Sanctions tool. We have also included formal KPIs for the following items:

- 1) % Employees who have undertaken their internal Modern Slavery training; and
- 2) % Tier 1 and Tier 2 suppliers having modern slavery obligations.

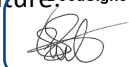
This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Mobile Broadband Network Limited's modern slavery and human trafficking statement for the financial year commencing 1 January 2022 and ending 31 December 2022.

This statement was approved by the MBNL Board of Directors on 16 June 2023.

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**David McKean**  
 MBNL Board Director 2023

Date: 6/27/2023

Signature DocuSigned by:  
  
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**James Smith**  
 Chair of the MBNL Board 2023

Date: 6/27/2023