

MBNL ANNUAL STATEMENT ON MODERN SLAVERY

FINANCIAL PERIOD 1 JANUARY 2025 – 31 MARCH 2026

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 financial period 1 January 2025 to 31 March 2026 ('FY26') 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 2025, MBNL's financial year was extended by three months to end on 31 March 2026 in order to effect a new financial reporting year that corresponds to that of its Shareholders.

MBNL takes a proportionate risk-based approach to reporting and seeks to align with the UK Transparency in Supply Chains (TISC) Statutory Guidance when reviewing and reporting on its anti-slavery activities.

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 - for component supplies for products used in the provision of MBNL's services;
- India - for operational support centres; and
- Europe - for product and service supplies.

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.

We have recently undertaken additional assurance activities for suppliers in order to further protect workers and identify any areas of improvement. These activities focused on health and safety and quality procedures. Following this review, in 2025 we successfully rolled out a new supply chain software assurance service, (Achilles) described below, which was a key target for 2025.

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 (PQQ).

In 2025 we rolled out a new supply chain assurance service, Achilles. Achilles plays a crucial role in addition to the MBNL PQQ process for those suppliers that undertake on-site works, by assessing that such suppliers and subcontractors meet industry recognised accreditation standards including health & safety protocols and adherence to corporate social responsibility standards.

The PQQ, and where applicable, the additional Achilles accreditation assessment, ensures 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. At the date of this statement more than 80% of MBNL directly contracted suppliers that access sites are accredited by Achilles with nearly 70% of the wider eco-system (third party suppliers and subcontractors) also being accredited. By embedding modern slavery criteria into the PQQ process, and the use of Achilles for a subset of suppliers, MBNL ensures 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.

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 supplier management methodology has been rolled out to all Tier 1-3 suppliers and operates in accordance with our commercial policy. 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 MBNL PQQ process, it enables us to identify and mitigate risks early.

Performance Assessment

MBNL monitors the effectiveness of its anti-slavery measures through a range of indicators, including supplier assurance coverage, completion of mandatory PQQ procedures, contract compliance reviews and issues raised via whistleblowing channels. Progress and outcomes are monitored via regular reporting both internally and to Shareholders and inform ongoing risk assessment and continuous improvement.

MBNL Supplier data, managed by the Commercial Office, maintains a record of all MBNL contracted suppliers PQQ status, annual check and any exceptions. All Tier 1-2 are included in the Key Risk Indicators reported via Commercial Committee with SHs and via the KRI report shared internally with the leadership team. Commercial internal audits are conducted quarterly and include a review of PQQ status.

We have also implemented a number of supplier audits during FY26 and these will continue each year as part of our assurance model. Where issues are identified, MBNL will work with that supplier to implement corrective action plans and prioritises the protection and remediation of affected workers. To date MBNL has had no such issues identified.

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 and updated in 2025.

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 and updated in 2025) 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 Company Secretary/Head of Legal (Commercial and Governance) or our Director of Legal, Governance and Operational Excellence.

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 period commencing 1 January 2025 and ending 31 March 2026.

This statement was approved by the MBNL Board of Directors on 18 September 2026.

Gervase King
MBNL Managing Director

Date: 18 September 2026