

Modern Slavery and Human Trafficking Policy

V2.1

Date 9th February 2026

Classification - Unrestricted



COMMSWORLD

commsworld.com

ORGANISATION

This statement applies to Commsworld Ltd (referred to in this statement as 'the Organisation').

OVERVIEW

There are millions of victims of modern slavery globally. Commsworld does not tolerate slavery or human trafficking in its business or supply chains and is committed to acting ethically and with integrity in all business relationships.

This policy sets out the actions Commsworld has taken to help ensure that slavery and human trafficking are not taking place in any part of its business or supply chains, and the steps taken to mitigate and manage associated risks.

DEFINITIONS

Commsworld considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

Commsworld acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions of the Modern Slavery Act 2015. This commitment requires ongoing review of both internal employment practices and external supply chains

Commsworld does not knowingly enter into business relationships with any organisation, in the United Kingdom or abroad, that supports or is found to be involved in slavery, servitude, or forced or compulsory labour.

No labour provided to Commsworld in the provision of its services is knowingly obtained by means of slavery or human trafficking. Commsworld adheres to applicable UK employment legislation and associated standards.

Our statement is being registered on the GOV UK Modern Slavery Statement Registry <https://modern-slavery-statement-registry.service.gov.uk/> and is available on our own web site at <https://www.commsworld.com/>

ALIGNMENT WITH INTERNATIONAL STANDARDS

Commsworld's approach to addressing modern slavery and human trafficking is informed by recognised international standards and guidance on responsible business conduct. This includes the principles set out in the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

These frameworks support Commsworld's commitment to embedding respect for human rights within its policies, identifying and managing risks within its operations and supply chains, and promoting transparency and continuous improvement.

SUPPLY CHAINS

In order to fulfil its activities, Commsworld's main supply chains include the provision of underpinning telecommunications services in the UK. These include, but are not limited to, data network carriers such as Openreach, TalkTalk Business, Virgin Media and CityFibre, alongside network infrastructure construction businesses and providers of network switching and routing equipment.

POTENTIAL EXPOSURE TO MODERN SLAVERY AND HUMAN TRAFFICKING

Commsworld recognises that modern slavery and human trafficking risks exist across many sectors and geographies, including within the UK. While the nature of Commsworld's business and its customer base means that overall risk is considered manageable, the Organisation acknowledges that no sector or supply chain can be considered risk-free.

Commsworld recognises that certain activities associated with telecommunications infrastructure, construction, engineering services and subcontracted labour may present heightened inherent risk. The Organisation does not assume the absence of modern slavery risk where no incidents have been identified. Instead, Commsworld adopts a **risk-based and continuously improving approach** to identifying, assessing and managing potential risks within its operations and supply chains.

This approach is reviewed regularly to ensure that emerging risks, changes in supplier arrangements and sector-wide developments are appropriately considered.

STEPS TAKEN TO PREVENT MODERN SLAVERY

Commsworld carries out due diligence processes to help ensure that slavery and human trafficking do not take place in its organisation or supply chains. These processes include review of supplier controls and engagement with key suppliers.

To the best of its knowledge, Commsworld has not conducted business with any organisation found to be involved in modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Commsworld has taken the following steps:

- **Risk Assessment**
Regular assessment of modern slavery risks within operations and supply chains, focusing on goods and services that may present heightened risk.
- **Due Diligence**
Ongoing review of key suppliers to ensure continued commitment to modern slavery prevention. Formal questionnaires are issued to key suppliers annually. No new key suppliers are onboarded without completion and review of the questionnaire by the Compliance Manager.
- **Training**
Provision of modern slavery awareness training during onboarding and on an annual basis, enabling staff to understand Commsworld's position and recognise potential risks.
- **Contractual Controls**
Inclusion of break-clauses within general terms and conditions, enabling termination of supplier contracts where involvement in modern slavery or human trafficking is identified.
- **Reporting**
Implementation of reporting mechanisms to enable concerns or potential incidents to be raised.

MONITORING, EFFECTIVENESS AND CONTINUOUS IMPROVEMENT

Commsworld recognises the importance of monitoring the effectiveness of its policies and controls. Ongoing review activities are undertaken to assess whether measures are operating as intended and to identify opportunities for improvement. These activities may include:

- Review of supplier questionnaire responses and follow-up actions
- Monitoring completion of staff training and awareness activities
- Review of reported concerns, near-misses or incidents
- Periodic review of this policy and related procedures

Findings are used to inform improvements to supplier engagement, training and internal controls. Commsworld is committed to strengthening its approach year-on-year in line with evolving guidance and best practice.

REMEDICATION AND RESPONSE

Where concerns relating to modern slavery or human trafficking are identified within Commsworld's operations or supply chains, the Organisation is committed to responding in a responsible and proportionate manner.

Commsworld's approach prioritises the safety, dignity and wellbeing of affected individuals and may include:

- Escalation to appropriate internal stakeholders
- Engagement with suppliers to require corrective action
- Suspension or termination of supplier relationships where appropriate
- Cooperation with relevant authorities or specialist organisations

Commsworld recognises that automatic disengagement from suppliers may, in some circumstances, increase harm to vulnerable individuals. Decisions are therefore taken on a case-by-case basis.

Version Control and Approval

Version	Date Issued	Brief Summary of Change	Owner's Name
V1.0	3rd June 2024	Commsworld have included a statement on Modern Slavery in our Ethics Policy since 2014. This is an expanded, standalone policy to reflect current views, legislation and our position on Modern Slavery and Human Trafficking.	John McDermott
V2.0	20 th January 2025	Revised and updated policy for FY ending 31 st December 2024. Glasgow office removed from contact details.	John McDermott
V2.1	27 th January 2026	Updated and revised to fully reflect the UK Home Office's updated Transparency in Supply Chains guidance (published March 2025) and alignment with International standards.	John McDermott

Author	John McDermott – Chief Delivery Officer
Approved by:	Bruce Strang – Commsworld Chief Operating Officer
Signed:	
Date:	09/02/2026

Review and consultation process:	This policy and the associated Modern Slavery and Human Trafficking Statement are reviewed annually to ensure continued alignment with legal requirements and current guidance. The annual statement is approved by senior management and signed by an appropriate director prior to publication.
Responsibility for Implementation & Training:	Day to Day responsibility for implementation and training rests with Commsworld's Compliance Manager and HR Director.
Distribution methods:	This Policy has been distributed to all Commsworld staff via email and is stored in its most current version on the Corporate Intranet.

Contact

Edinburgh

Commsworld Ltd
Queen Anne Drive
Newbridge
Edinburgh EH28 8LH
T 0330 1210000

