

Slavery and Human Trafficking Statement

1. Scope

- a. This statement sets out Magdalene Limited's ("Magdalene") strategy to enable identification of all potential modern slavery and human trafficking risks to its business.
- b. The statement applies to the period 1 April 2021 to 31 March 2022.
- c. Magdalene recognises that it has a responsibility to take a robust approach in this area and is therefore absolutely committed to preventing slavery and human trafficking at all levels of its corporate activity.
- d. This statement therefore explains the measures being taken by Magdalene to ensure that there is no slavery or human trafficking in its own business and/or its supply chain.

2. Structure and supply chains

- a. Magdalene is a leading UK telecommunications infrastructure services provider which operates across all segments of the telecommunications market, providing a turnkey service to communication service providers and equipment vendors.
- b. Our main office is in St Ives, Cambridgeshire, we have regional offices located in Scotland and Northern Ireland and other satellite offices in England. We also utilise a nationally spread field-based workforce to carry out our telecom infrastructure works.
- c. Activities are predominantly carried out in the UK including Northern Ireland.
- d. The Company principally relies on its core of highly-skilled employees to carry out work but also makes strategic use of contract and sub-contract labour through reputable and trusted suppliers.
- e. Given the structure of the organisation and its setup in relation to supply chains, the Company does not consider there to be a material risk of the existence of slavery or human trafficking.

3. Procedures and policies

- a. Magdalene operates a number of policies and procedures which demonstrate its approach to identifying, minimising and dealing with issues of modern slavery within its operations and supply chains.
 - i. **Ethical Business Code of Conduct.** The Company's Ethical Business Code of Conduct details Magdalene's approach to working ethically and sustainably as well as highlighting to customers and potential customers how we expect all parties to interact and operate.
 - ii. **Supplier Approval and Management Process ("SAMP").** The Company's SAMP seeks to ensure that Magdalene operates in an ethical manner which benefits both society and the environment. The Company recognises that its suppliers have a direct impact on the quality of service delivered to its customers and therefore emphasises through the CSMP the need to closely and consistently monitor these key stakeholders as required.
 - iii. **Whistleblowing Policy.** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply

chains of, Magdalene which includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

- iv. **Recruitment.** The Company principally relies on its core of employees to carry out work and in all cases, ensures that these employees have the right to work in the UK and are remunerated to comply with the National Minimum / Living Wage guidelines. This procedure is adopted for all directly engaged contractors and temporary workers. Any temporary workers are sourced from well-known and reputable agencies where we are able to verify their practices.
- v. **Training.** All employees, temporary workers and directly engaged contractors attend a Company induction where they are given awareness information regarding slavery and Magdalene's zero tolerance approach to it. Additionally, they are provided with information on how to raise their concerns if they were to ever become aware of the existence of slavery within the Company's operations.

4. Due Diligence of Suppliers

- a. Magdalene is committed to ensuring that its suppliers adhere to the highest ethical standards. Prior to their appointment, Suppliers are required to confirm and, where it is deemed there may be a risk, demonstrate that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour.
- b. Magdalene also makes it a contractual requirement that suppliers adhere to the Ethical Business Code of Conduct. Serious violations of the Code by a supplier will lead to termination of our business relationship.
- c. The Company will review its supply chain periodically for the purpose of;
 - i. Evaluating if the risk of modern slavery and human trafficking violations within the supply chain have changed
 - ii. Recommending and conducting audits or assessments if and when material risks are identified
 - iii. Taking steps to identify substandard supplier practices and, where appropriate, providing advice to suppliers and requiring of them the implementation of corrective action plans
 - iv. Invoking appropriate sanctions against supplier that fail to improve their performance

5. Responsibilities

- a. It is the responsibility of the Head of HR with support from the Commercial Department for ensuring that the Company's employees, workers and direct contractors are recruited from reputable sources and that the appropriate right to work checks are completed. Additionally, the Head of HR is to support the investigation process where any concern in relation to slavery or human trafficking occurs within the aforementioned population. The Head of HR is to initiate a review of this statement or the appropriate procedure or policy in relation to employees, workers and director contractors where there is sufficient justification to do so.
- b. Whilst it is acknowledged that the responsibility for respecting human rights in the supply chain vests in the supplier, Magdalene, through the Commercial Department, will communicate our values and expectations throughout the supply chain. The Commercial Department will also ensure that suppliers and potential suppliers confirm and, where relevant, demonstrate their adherence to the Ethical Business Code of Conduct.

- c. It is the responsibility of the Quality Assurance Department, in conjunction with the Head of HR and Commercial Department, to ensure that Magdalene's policies are sufficiently robust to achieve their primary purpose of ensuring that the risk of human trafficking and slavery within the Company's activities are eliminated. The Quality Assurance Department will also ensure that Company's policies are implemented and observed and, in conjunction with the Head of HR and Commercial Department, will undertake investigations and due diligence where risks are identified.

6. Board approval

- a. This statement has been approved by the Company's operational board and will be reviewed annually in April or at such times as organisational or legislative changes impact upon its content.



Mark Turner
Managing Director – Magdalene