

SCHEDULE M: TOTSCO ANTI-MODERN SLAVERY STATEMENT VERSION 1 - EFFECTIVE FROM THE PRODUCTION DELIVERY DATE

Introduction

This **Anti-Modern Slavery Statement** is a schedule to **our agreement** with you.

It explains how **we** comply with our obligations to act lawfully, including compliance with **our** obligations under the Modern Slavery Act 2015.

Our Statement on Modern Slavery

We are fully dedicated to eradicating slavery and human trafficking from all aspects of our corporate operations, as well as ensuring that **our** supply chains remain free from such practices. As a participant in the telecommunications sector, **we** acknowledge **our** responsibility to engage in ethical business activities, which include upholding a supply chain that is entirely free from slavery.

This statement serves to reaffirm **our** unwavering stance of zero tolerance towards modern slavery. It outlines **our** commitment to proactively identify and address any potential risks of modern slavery associated with **our** business operations, as well as the measures **we** have implemented to prevent such practices from occurring.

Relevant Policies:

Employee code of conduct: **Our** code of conduct highlights to employees the actions and behaviour expected of them whilst representing our company. When operating and managing our supply chain, **we** endeavour to uphold the highest standards of employee conduct and ethical behaviour.

Whistleblowing policy: In line with **our** whistleblowing policy, **we** encourage all **our** employees, customers, and other business partners to report any concerns related to TOTSCo. This includes any circumstances that may give rise to an enhanced risk of human trafficking or slavery. **Our** whistleblowing procedure allows employees, customers, or others to raise any concerns without fear of retaliation.

Due diligence investigations:

We recognise that TOTSCo has due diligence to carry out investigations on new suppliers and review its existing suppliers. **Our** due diligence report encompasses the following key elements:

Identification of Risks: **Our** due diligence process involves an assessment of the risks related to modern slavery and human trafficking for both products and geographical areas. This assessment applies to all new suppliers. In cases where high-risk suppliers are identified, they are promptly flagged for further attention and action.

Ongoing Risk Assessment: **We** conduct an annual evaluation of the risks associated with modern slavery and human trafficking for all current suppliers. This assessment ensures that we remain vigilant in monitoring and addressing any evolving risks within our supply chain.

Supplier Assessments: As part of our commitment to upholding human rights, particularly concerning slavery and human trafficking, **we** conduct thorough supplier assessments. These assessments specifically focus on the identification and mitigation of risks associated with these issues, based on general risk factors.

Sanctions for Ethical Improvements: In cases where suppliers fail to demonstrate satisfactory ethical standards regarding slavery and human trafficking, appropriate sanctions are invoked. These sanctions are designed to encourage and enforce the improvement of ethical standards within **our** supply chain. Through these measures, we aim to proactively address the risks of modern slavery and human trafficking, promote responsible sourcing, and hold suppliers accountable for maintaining high ethical standards.

Training:

To help maintain a supply chain free from modern slavery, **we** require our staff to complete in-house training on modern slavery. Our training covers:

- The Modern Slavery Act 2015.
- How to assess the risk of slavery and human trafficking about our suppliers, and business.
- How to identify the signs of slavery and human trafficking.
- How to report any suspected slavery or human trafficking.
- The steps our organisation should take if suppliers do not implement anti-slavery policies within high-risk scenarios. This includes removing them from the TOTSCo supply chain.