

Anti-Slavery and Human Trafficking Statement

For the financial year ended 31 December 2019

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Introduction

Hyperoptic Ltd (“Hyperoptic”) is committed to acting ethically and with the utmost integrity in all our business relationships, taking a zero-tolerance approach to slavery and human trafficking. We are committed to compliance with the duties set out within the Modern Slavery Act 2015 (the “MSA”) and, furthermore, expect our suppliers and supply chains to take all reasonable steps to do the same. We also expect our suppliers and their supply chains to engage in other appropriate employment practices, and to comply with all relevant legislation and regulations in the countries in which they operate.

As a responsible organisation, we strive to incorporate respect for human rights into our employment practices and our values. We aim to ensure that all who work for and with us do so freely and receive fair remuneration in return. Our human resources processes are designed to ensure that all direct employees are treated fairly and in a way that safeguards their human rights.

Our business and supply chains

Hyperoptic is a UK internet service provider. We build and provide fibre-to-the premises high-speed broadband networks and offer our customers full fibre internet, as well as VoIP telephone services, that work over the broadband network we provide.

We also have an office in Serbia, which provides support functions for the UK business.

In our business, our Compliance Team has been given responsibility for making sure that we meet our MSA obligations and that we identify and appropriately deal with any modern slavery risk that might exist in our supply chains.

Hyperoptic uses suppliers to provide UK-based labor, to support engineering teams in the provision of fibre broadband. These supply chains are contained within the UK.

In relation to our other suppliers, we are working on mapping our supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.

Where we use suppliers to provide us with contractors and agency workers, we might not know the terms on which they are engaged by the suppliers. Similarly, where any entity supplies us with goods from another supplier, we might not know the terms on which those goods (or parts of them) are supplied. To help mitigate this, we’ve started to include questions about compliance with the MSA in our procurement process and include a requirement to comply with relevant laws, including the MSA, in our contracts with suppliers. (See “Procurement Process” below for more details).

Our policies to support compliance with anti-slavery and human trafficking laws

To support our compliance with the MSA, we have in place the following processes. We aim to produce policies to support these during the financial year ending 31 December 2020.

Recruitment Process

The majority of recruitment in Hyperoptic is carried out directly. All staff are salaried and paid above the minimum wage, where applicable, and checks are carried out to ensure employees' right to work in the UK or Serbia, as appropriate. Our agreements with recruitment agencies also require their compliance with the MSA.

Procurement Process

Our procurement process requires our suppliers, in the contracts they enter with us, to:

- comply with all applicable anti-slavery and human trafficking laws and regulations (including the MSA)
- not to act in any way that would be an offence under sections 1, 2 or 4, of the MSA (if such activity had been carried out in the UK)
- to promptly report to us any actual or suspected instance of slavery or human trafficking in a supply chain related to that contract.

Potential suppliers are required to confirm that they have read and agree with this statement prior to contract signature.

Publicising Policies

As we create policies to support existing and developing processes, we'll make them available to our employees via our Compliance SharePoint web-based portal. We'll also provide potential new suppliers with our procurement policy as part of the onboarding process when we first engage with them.

Hyperoptic will monitor these policies and update them as necessary to ensure they remain relevant and meaningful.

Due diligence on modern slavery risk in our business and supply chains

Our Compliance Team aims to do everything we can to eliminate the risk of modern slavery occurring in our business and supply chains. We plan to carry out the following actions during the financial year ending 31 December 2020:

- regularly reviewing existing suppliers to check for evidence of compliance with the MSA
- broadly mapping our supply chain to assess product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier by asking them to sign up to our standards, and to supply details of any policies they may have in place
- ensuring that we have a suitably compliant recruitment process and adequate policies within our Staff Handbook
- operating within the bounds of the Ethical Trading Initiative's Base Code and checking, where possible, that suppliers do the same

Areas of risk

Hyperoptic plans to add a modern slavery risk profile to relevant suppliers. Where we identify such a risk, we'll take steps to improve suppliers' relevant practices - including requiring them to implement action plans proposed by our Compliance Team. Any such actions will be followed up by subsequent reviews and discussions with the supplier. If we find that a supplier fails to work with us towards eliminating such risks, we'll stop working with them (subject to finding a suitable alternative).

Moving forward, we'll consider the most salient areas of risk by country and, within those posing a higher risk, focus on relevant suppliers and supplies according to the types of goods and services received. We'll then consider how we can reduce any risks identified.

Performance indicators

Hyperoptic is mindful that KPIs within our business model can make our supply chains vulnerable to modern slavery - for example, encouraging faster turnaround times or the sourcing of goods/ services at a lower cost. Going forward, we'll aim to closely monitor these areas to ensure that any risks related to modern slavery and human trafficking are minimised.

Training

Hyperoptic has not previously included MSA compliance training for staff or suppliers, but will be working to introduce essential sections in our Staff Handbook and new supplier onboarding documents.

