

# MODERN SLAVERY STATEMENT

## 1. PURPOSE

Happy Telecom and its subsidiaries ("the Company or Happy Telecom"), is committed to improving its practices to combat slavery and human trafficking.

The Company is committed to continuously improving its supply chain due diligence procedures, including appropriate checks to prevent and protect against slavery and human trafficking.

## 2. SUPPLY CHAIN

Our supply chain includes independent contractors, management companies, job boards, property, media, IT infrastructure, software and equipment providers, whilst our clients include international telecoms businesses.

## 3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have appropriate policies in place that underpin our commitment to zero tolerance of modern slavery or human trafficking in our supply chain or in any part of our business. We regularly review and update all our policies. These include our Code of Conduct, Procurement policy, and Speak Up policy.

## 4. DUE DILIGENCE

We have in place processes and procedures to identify, assess, mitigate, and monitor potential risk areas in our supply chain, including slavery and human trafficking risks. These include:

- Training for our employees to help them better understand the risk of modern slavery and human trafficking.
- A supplier code of conduct which includes requirements to combat modern slavery and human trafficking.
- Dedicated procurement specialists in charge of our critical suppliers.

## 5. CONTINUOUS IMPROVEMENT

We continue to invest in making our supply chain procedures more effective, improving our existing vendor due diligence procedures, and raising awareness amongst staff.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for Happy Telecom's 2024/2025 financial year. Board approval for this statement was received on 29 April 2024.

## **6. ENQUIRIES**

Our directors is responsible for reviewing this statement annually to ensure that it meets legal or other regulatory requirements and reflects best practice. If you have any enquiries relating to this statement, please contact us via the contact page on the Company website.

*A. B. Whitely*