

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Telent Technology Services Limited

### Introduction

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and supply chains. This statement relates to our actions and activities during the financial year 1st April 2022 to 31st March 2023. As part of the telecommunications sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### Organisational Structure

We are a provider of mission-critical digital services in a variety of industries from telecommunications and transport, to utilities and the emergency services. We are a subsidiary of Telent Limited. We have approximately 2,406 employees and operate in the UK and Ireland. We have reported annual revenue of approximately £476.1 million.

### Our Business

Our business delivers services through three main areas of activity:

**Network Services** – We provide design, installation, integration, and on-going support of mission-critical digital infrastructure, including communication networks, storage and hosting systems, applications and terminals and devices. We are focused on Telecom Service Providers, Emergency Services, Maritime Safety, Public Sector and Large Enterprises.

**Transport** – We provide design, installation integration, whole-life management and operation of mission-critical digital infrastructure, including operational networks, transport communication and management systems, control and automation systems and digital asset management. We are focused on the Rail, Metro and Highway sectors.

**Infrastructure Services** – We provide a co-ordinated solution of the design, installation, commission, support and maintenance challenges of telecoms networks

### Our Supply Chain

We have a supply base of around 2,600 suppliers, the majority of which are based in the UK and are geographically aligned to projects, supporting our ethos of local support. We require our suppliers (including overseas suppliers where required) to provide:

- products ranging from low value commodities to high value innovative equipment;
- personnel ranging from low-skilled workers to strategically skilled engineers; and
- services ranging from simple, short duration, small value to complex, longer duration, high value.

## **Our Anti-Slavery**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Responsible Procurement, Speak Up, internal and external Anti-Slavery Policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our external Anti-Slavery Policy which our suppliers must comply with can be found at <https://telent.com/about/compliance-statements>. Our Responsible Procurement and Speak Up Policy can be found at <https://telent.com/our-policies> and <https://telent.com/speak-up>.

## **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk, we undertake due diligence when taking on new suppliers and regularly review existing suppliers. This includes:

- reviewing on an annual basis our anti-slavery policies;
- broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier via a pre-qualification questionnaire and reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- ensuring that all internal processes are being adhered to for example ensuring that personnel provided by suppliers have a right to work in the UK, ensuring that limited company contractors are paid into verified company bank accounts and ensuring that suppliers of personnel do not use off-shore payment solutions;
- conducting on-site and remote supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where a supplier is considered to be higher risk;
- actively encourage all Telent stakeholders including employees, suppliers and their employees to speak up and inform us of any actual or suspected malpractice. We therefore provide an anonymous reporting mechanism to protect whistle-blowers which encourage individuals to speak up without fear of reprisal, provide a formal approach to our responses and boost our due diligence; and
- where violations are identified, supporting a supplier to implement a corrective action plan with the aim of resolving violations within an agreed time period, assisting to improve a suppliers' practices by sharing best in class practices within an open forum and invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct which may include the termination of the business relationship.

We have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

## **Supplier Adherence to our Values**

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chain comply with our values, we have implemented processes to:

- clearly communicate our expectations to our supply chain in respect of sustainability, anti-corruption and bribery and ethical procurement;
- encourage our suppliers to cascade a similar process and expectation within their own business and supply chain;
- ensure adherence to our policies at supplier selection, on-boarding, risk analysis, performance measurement and continual assessment; and
- ensure that adherence to our policies is a contractual obligation in our agreements with suppliers.

We have a committed compliance team, which includes stakeholders from the following departments:

- Legal;
- Human Resources;
- HR Talent Acquisition; and
- Procurement and Supply Chain.

## **Awareness Training**

We have implemented an awareness training programme for our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

## **Monitoring Our Effectiveness in Combating Slavery and Human Trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

<b>Target</b>	<b>Measure</b>
100%	New staff are inducted on our Anti-Slavery Policy
100%	Suppliers with a turnover above £36 million requested to provide us with a copy of their Modern Slavery and Human Trafficking Statement
100%	'High risk'* suppliers issued with our Anti-Slavery Policy and requested to provide written confirmation that they will comply

\*We consider existing suppliers and new suppliers of personnel and existing and new overseas suppliers as potentially 'high risk' areas in respect of modern slavery within our organisation.

## **Further Steps**

In addition to pursuing the Key Performance Indicators above, we will:

- Continue with bi-annual updates to the board;

- Continue to develop and/or improve our anti-slavery training and awareness programme to combat slavery and human trafficking;
- Continue to monitor and mitigate risk through our due diligence processes;
- Review our Key Performance Indicators to ensure that they remain effective and suitable;
- Request that “high risk” suppliers not only comply with our Anti-Slavery Policy but develop their own; and
- Continue to adhere to and adopt good industry practice to combat slavery and human trafficking.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2023.**

This statement has been approved by our board, who will review and update it annually.

**John Kimpton  
Finance Director**

**Date:** 10 August 2023