Modern Slavery and Human Trafficking Statement

Deutsche Telekom (UK) Ltd specializes in the development and support of products and services for telecommunications operators, including mobile commerce. Deutsche Telekom (UK) Ltd is 100% owned by Deutsche Telekom Group.

This statement outlines the policies and procedures Deutsche Telekom (UK) Ltd has in place to mitigate and manage the potential risk of modern slavery and human trafficking in its operations and supply chains.

Our commitment

Deutsche Telekom (UK) Ltd is committed to driving out acts of modern slavery and human trafficking within our business and supply chain. Deutsche Telekom (UK) Ltd is committed to acting ethically and with integrity in dealing with partners, suppliers and customers, and to implement systems and controls that effectively ensure modern slavery and human trafficking is not taking place anywhere in our business or that of our supply chain.

Our strategy to addressing modern slavery and human trafficking is detailed below and is managed through a combination of Deutsche Telekom (UK) Ltd and Deutsche Telekom Group policies and procedures.

Our policies

Deutsche Telekom (UK) Ltd has reviewed its company policies to ensure that modern slavery and human trafficking receives increased focus. The key Deutsche Telekom (UK) Ltd and Group policies that have been reviewed are:

- Modern slavery policy
- Code of Human Rights & Social Principles
- Supplier Code of Conduct
- General terms and conditions for purchasing by the Deutsche Telekom Group
- Group policy on avoiding corruption and other conflicts of interest
- Sustainable procurement strategy

Deutsche Telekom (UK) Ltd and Deutsche Telekom Group have extensive and rigorous risk management and compliance processes in place. The majority of these are detailed in the Groups Code of Human Rights & Social Principles document and include regular impact assessments across organizational units and an annual review to verify the observance of the Code. The Group has also appointed Human Rights points of contact at corporate and group unit levels to address any internal or external inquiries.

Our due diligence process of our supply chain

Deutsche Telekom (UK) Ltd has carried out a detailed review with external advisors of its supply chains and of its procurement processes to identify where there may be potential risks of modern slavery or human trafficking. This showed that overall there is low risk, as the company's activities do not directly involve operations where modern slavery or human trafficking are known to occur.

Some categories of products and services provided by third party suppliers have been identified as presenting a potential risk in the supply chain. These categories are:

- Exhibition organisations
- Cleaning services
– Building contractors
– Technology hardware, including mobile phone services, computer providers and audio visual equipment

Deutsche Telekom (UK) Ltd is now carrying out additional due diligence on the categories, including increased use of the Ecovadis CSR platform and requesting information about the supplier’s own policies and mitigation processes. Suppliers must also sign up to the Supplier Code of Conduct which prohibits all forms of slavery and any forced or child labour.

**Awareness and Training**

As part of Group-wide compliance processes, training is provided to all employees, relevant stakeholders and suppliers on the Code of Human Rights & Social Principles. Further training is provided to Deutsche Telekom (UK) Ltd procurement employees through the Sustainability in procurement e-learning tool, which includes details on the use of the Ecovadis CSR platform.

This statement is owned by Sasha Marchant and approved by the Board of Directors. It is reviewed annually and published on Deutsche Telekom (UK) Ltd website.