

MLL – Modern Slavery Statement

V 3.0

16/08/2022

© MLL Telecom Limited 2022. This document is confidential to MLL Telecom and use and disclosure by the recipient is restricted to internal use by the recipient. This document does not constitute a representation or warranty and is not contractual unless specifically referenced in a written contract between MLL Telecom and the recipient.

Document information

Document Name	MLL Document
Prepared By	Helen Taylor
Effective Date	16/08/2022
File Name	MLL – Modern Slavery Statement
Document Owner	Helen Taylor

Updates

Version	Date	Updated By	Changes
0.1	13/07/2018	Helen Taylor	Document Drafted
1.0	26/04/2019	Helen Taylor	Updated to Sharepoint
2.0	06/04/2020	Helen Taylor	Annual Review – no changes
2.1	19/03/2021	Helen Taylor	Annual Review – no changes
2.2	15/03/2022	Helen Taylor	Annual Review – no changes
3.0	16/08/2022	Helen Taylor	Anti-Slavery Policy renamed as new legal requirement on MLL for a Modern Slavery Statement

Distribution

Name	Position	Purpose
Helen Taylor	Director; People & Performance	Owner of Document
All	Staff	For Reference

Table of Contents

1	Introduction	4
	Scope of this Policy	4
2	Modern Slavery Statement	4
	Organisational Structure.....	4
	Commitment to the principles of the Modern Slavery Act 2015	4
	Supply Chain & Risk Assessment	5
	Training	5
	Policies in relation to slavery and human trafficking.....	5
	Legal Considerations.....	6
3	Implementation, Monitoring & Review	6
4	Key Performance Indicators.....	6
5	Scope of Report and Review	6

© MLL Telecom Limited 2022. This document is confidential to MLL Telecom and use and disclosure by the recipient is restricted to internal use by the recipient. This document does not constitute a representation or warranty and is not contractual unless specifically referenced in a written contract between MLL Telecom and the recipient.

1 Introduction

MLL Telecom Ltd. ('the Company', 'MLL') acknowledges its responsibilities in relation to addressing the possibility of people working on company contracts being the subject of covert coercion. It will seek to identify the possibility of existing or potential staff members, contractors and suppliers being affected by modern slavery and commits to complying with the provision in the Modern Slavery Act 2015.

MLL is committed to a zero-tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors and those with whom it does business. MLL understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

MLL seeks to expose any practices that may breach either legislative or internal standards and promote an approach to the management of employees, consultants and contractors that is based on mutual respect.

Scope of this Policy

This policy applies to all employees, workers, contractors and consultants and any other persons doing business and/or engaged within the supply chain, associated with the business of the Company.

2 Modern Slavery Statement

This statement has been published in accordance with section 54(6) of the Modern Slavery Act 2015. It outlines the steps that MLL has taken in the year ending 31 March 2022 to prevent modern slavery and human trafficking in its business and supply chains.

Organisational Structure

MLL is a UK based entity providing telecommunication services to a range of customers also based in the UK. Our head office is in Marlow, Buckinghamshire, and we have a distribution depot in Silverstone, Northamptonshire.

As of 01 April 2022 we employ approximately 180 people across a range of our key business functions in Central, Service Provider and the Public Sector.

Commitment to the principles of the Modern Slavery Act 2015

MLL is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude, forced or compulsory labour.

Supply Chain & Risk Assessment

MLL uses a wide range of suppliers; the vast majority of our suppliers are UK-based and not in high-risk industries or supplying products or services in high-risk groups. Therefore due to the nature of our business, we have a low risk of modern slavery in our business and supply chains.

We understand that the biggest risk for modern slavery is in our supply chain and we seek to identify aspects of our supply chain potentially exposed to the risk of slavery and human trafficking, as articulated by the Global Slavery Index. We apply a risk-based approach to due diligence on suppliers, which includes modern slavery, financial checks and a requirement that they sign up to our Supplier Code of Conduct.

MLL operates a supplier onboarding procedure that requires all suppliers to achieve certain minimum standards. These are explained in our Supplier Code of Conduct in the Respect for the basic human rights of employees section, which together with our Terms of Business gives us audit rights to ensure compliance with our standards, and any relevant laws and regulations.

Due Diligence Process

As part of our continually initiatives to identify and mitigate the risk of modern slavery to be low, we have put in place systems to:

- Follow the national minimum wage and working time regulations.
- Ensure fair and consistent treatment of individuals.
- Identify and assess potential risk areas in our supply chain.
- Mitigate the risk of slavery and human trafficking in our supply chain.
- Monitor potential risk areas in our supply chain.
- Provide awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Encourage anyone to raise any concerns about modern slavery and protect whistle blowers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we require staff to complete mandatory training as part of their induction process and annual compliance refresher training.

Policies in relation to slavery and human trafficking

MLL is committed to acting ethically and with integrity in all our business activities and the following the following policies also support the actions taken by the business and are reviewed annually and updated as required to ensure opportunities for continuous improvement are taken at every opportunity.

- Human Resources Security Policy.
- Whistle Blowing Policy.
- Bullying and Harassment Policy.
- Diversity Policy.
- Equal Opportunities Policy.
- Supplier Management Policy.

Legal Considerations

The following legislation apply to this policy:

- Employment Rights Act 1996.
- Equality Act 2010.
- Modern Slavery Act 2015.

MLL continues to review and develop its systems and process to manage modern slavery risks. We remain focused on assessing our high risk spend areas and on raising awareness across all staff to ensure all products and services are sourced and supplied responsibly and ethically.

3 Implementation, Monitoring & Review

This policy will take effect from the Effective Date and will be reviewed from time to time and may be subject to change.

The management team will receive performance reports on compliance with this Policy at regular intervals and have all incidents reported directly. They will ensure that sufficient resources are provided to effect suitable monitoring, reviews and reporting will be provided.

4 Key Performance Indicators

At each annual review of this policy, we will look to review performance measures against the effectiveness of steps being taken which may include:

- Review of new onboard suppliers.
- Assessment of high risk suppliers (annual confirmation Against certain criteria).
- Compliance Training completion rates.
- External accreditations.

5 Scope of Report and Review

This statement has been published in accordance with section 54(6) of the Modern Slavery Act 2015. It outlines the steps that MLL has taken in the year ending 31 March 2022 to prevent modern slavery and human trafficking in its business and supply chains.

The Act requires all large UK businesses (with a turnover of £36million or more) to publish such a statement.

The MLL board has reviewed and approved this Modern Slavery statement and is committed to supporting its delivery.

Shaun Ledgerwood
Chief Executive Officer, MLL Telecom Limited
17 August 2022