

# **Slavery and human trafficking statement for the financial year ended 31 December 2018**

This statement is made by Wireless Infrastructure Group Ltd (WIG) pursuant to Section 54 of the Modern Slavery Act 2015 (“MSA”) and applies to all WIG’s subsidiaries and holding companies (as defined in the UK Companies Act) whether incorporated within or outside the UK.

This statement was approved by the Board of Directors of the Company on 2nd May 2019.

## **Overarching statement**

WIG is committed to acting as a responsible company and employer. We take responsibility for our actions, carefully consider how others will be affected by our choices and ensure that our values and ethics are integrated into our formal business policies, practices and plans.

In particular, WIG is committed to ensuring that there is no slavery or human trafficking in its business or supply chains.

## **Meaning of slavery and human trafficking**

Our understanding of slavery and human trafficking is based on the definitions set out in the MSA and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO) particularly relating to forced or compulsory labour. We recognise that forced labour as a form of slavery includes debt bondage and the restriction of a person’s freedom of movement whether that be physical, non-physical or, for example, by the withholding of a worker’s identity papers.

## **WIG Business**

WIG is a Telecommunications Infrastructure provider operating internationally across the UK, Ireland and The Netherlands. WIG owns or operates in excess of 2000 sites across these territories, predominantly though in the UK.

At 31 December 2018 we had 54 employees all of whom are based in the UK.

WIG’s policies are consistent with standard human rights principles established in the territories that we operate in. Our policies cover areas such as equal opportunity, diversity, recruitment and selection, health and safety and employee behaviour. We also have established grievance and disciplinary procedures.

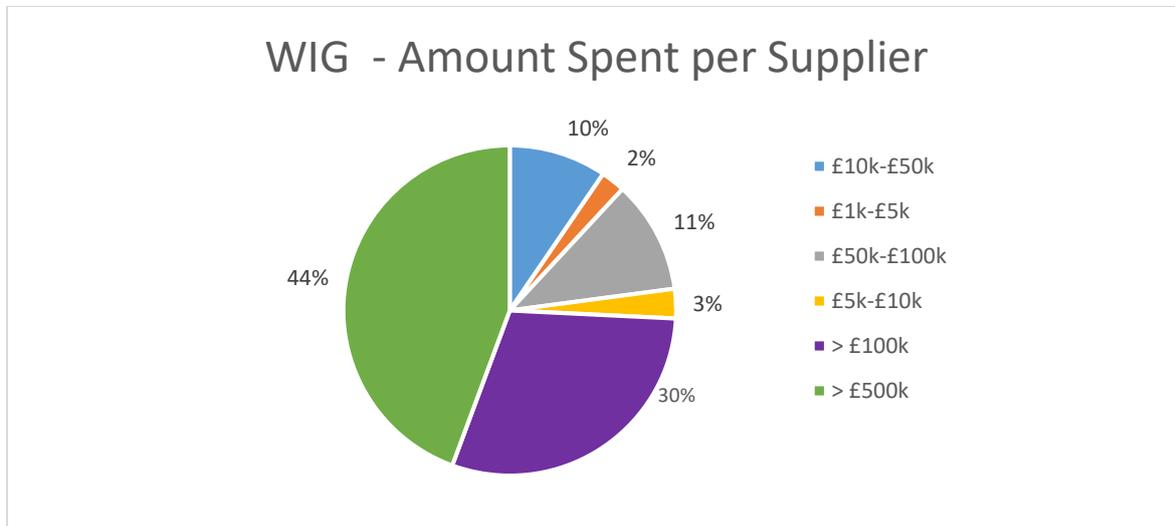
We comply fully with applicable human rights legislation in the United Kingdom, for example covering areas such as freedom of association and the right to collective bargaining, equal remuneration and protection against discrimination. For all matters relating to human rights, we will comply with local laws, and if those laws provide lesser protection than UK law, we apply the principles enshrined in UK law.

## **WIG governance structure**

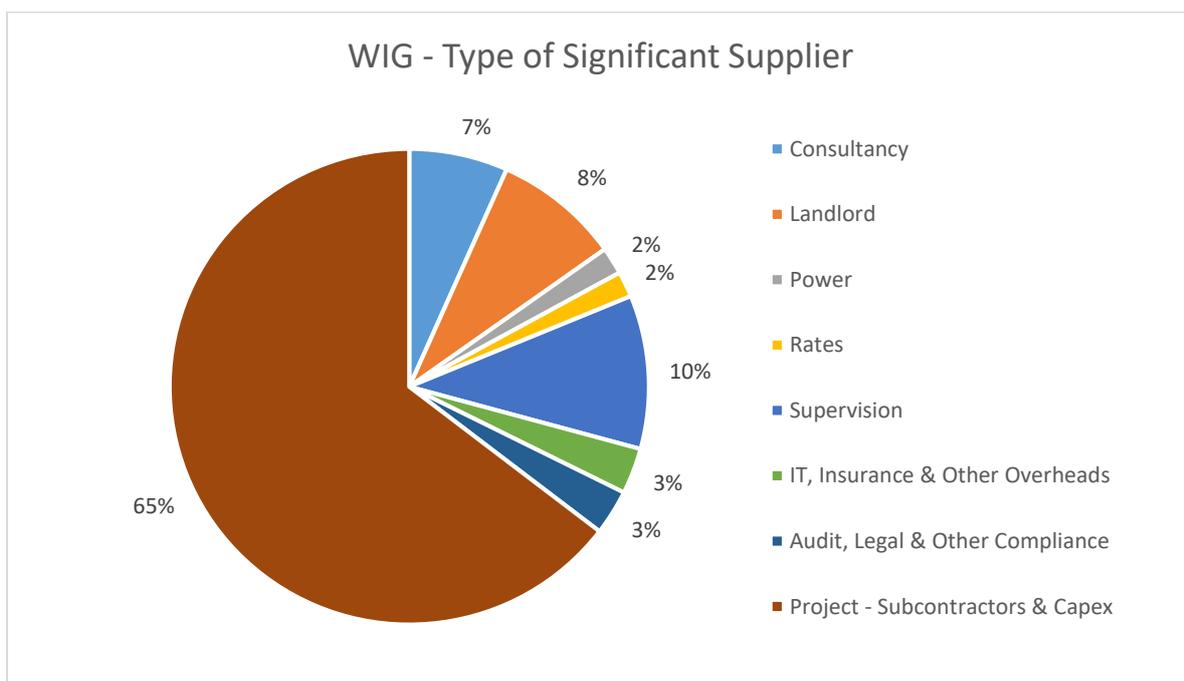
The Board is responsible for corporate responsibility, including issues such as slavery and human trafficking. The Board reviews our approach and policies in this important area whilst day to day responsibility rests with executive management and, in particular, the Chief Executive. The Chief Executive and other executive management oversee and monitor policies and procedures and address any issues if they arise.

## WIG supply chain

In the financial year to 31 December 2018 (FY18) WIG received goods and services from over 500 suppliers (this excludes supplies other than in the nature of goods or services such as payments to national tax authorities in relation to staff income tax). The pie chart below shows the distribution of WIG supply chain in FY18 in terms of amount by supplier.



Suppliers who were paid over £100,000 for goods or services in FY18 (“Significant Suppliers”) accounted for 74% of WIG’s total supplier spend in FY18 and those paid over £500,000 accounted for 44%. There were 37 Significant Suppliers equating to 7% of total suppliers by number. The pie chart below shows the breakdown of Significant Suppliers by type of supplier.



65% (by spend) of Significant Suppliers were subcontractors engaged on project activities to maintain our sites or to install, upgrade, or remove customer equipment on our sites, or to supply and install WIG owned equipment. WIG has conducted a review of its Significant Suppliers and for those who we consider higher risk in terms of the nature of goods or services supplied, we have reviewed or been in contact with each of them to understand in more detail (i) the extent to which each such supplier is itself required to publish a statement under Section 54 of the MSA and (ii) the steps which each supplier is taking to mitigate the risks associated with slavery and human trafficking in their respective businesses and supply chains. WIG will continue to monitor the risk profile of its suppliers.

WIG will include specific MSA wording in its standard terms and conditions documentation which it issues to potential suppliers when WIG procures the supply of goods or services.

### **Monitoring and Review**

We will continue to monitor our supply chain and portfolio in relation to slavery and human trafficking through our supplier reviews.

### **Awareness and communication**

Targeted awareness and communications for those WIG staff who manage key supplier relationships has been implemented to mitigate the risks associated with modern slavery and human trafficking in the supply chain.



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**Scott Coates**  
**Chief Executive Officer**  
**Wireless Infrastructure Group**

### **Wireless Infrastructure Group Entities covered by this Statement:**

**WIG Holdings I Limited**  
**WIG Holdings II Limited**  
**UK WIG I Limited**  
**UK WIG II Limited**  
**Wireless Infrastructure Group Limited**  
**The Wireless Resources Company Limited**  
**The Wireless Infrastructure Company Limited**  
**The Wireless Asset Company Limited**  
**The Wireless Development Company Limited**  
**Fields and Towers Limited**  
**Telecommunications Wireless & Infrastructure Services Limited**  
**Open Network Systems Limited**  
**Kiolpa Limited**  
**Telecomms Infrastructure Suppliers Limited**  
**Highpoint Communications Limited**  
**WIG (Netherlands) B.V.**