

Company Policy					
POL Number:	18	Revision:	09	Owner:	HR Manager
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MODERN SLAVERY POLICY STATEMENT

SpliceGroup Europe Ltd (SpliceGroup) is committed to conducting itself with integrity, providing its employees with a safe environment in which to work and being transparent in its business dealings.

SpliceGroup has a zero-tolerance approach to slavery and is committed to protecting human rights in the UK and overseas.

About SpliceGroup Europe Ltd

SpliceGroup provides a wide range of end-to-end fibre connectivity solutions to organisations through the design, manufacture and installation of fibre optic systems. Operating in Europe, the USA and Asia, the company both buys and sells products and services on a global scale.

What is modern slavery?

Modern slavery refers to the violation of an individual's human rights. It is a crime that exploits an individual for the personal or commercial gain of others by tricking, coercing or forcing individuals into losing their freedoms. Modern slavery takes many forms including but not limited to:

- Human trafficking
- Forced labour
- Debt bondage/bonded labour
- Child slavery
- Forced marriage

To ensure we do all we can to prevent and identify modern slavery within our supply chain we operate the following policy and governance practices.

Employment practices

Whistleblowing policy - we operate a whistleblowing policy so that all employees know how to raise concerns about wrongdoing within the business or its supply chain and can do so without fear of reprisals.

Employment practices – we operate a robust recruitment policy, including conducting eligibility checks to ensure all employees have the legal right to work in the country in which they are employed. Vetting checks on an individual's financial and criminal records are completed where applicable. Employees' salaries are paid only into bank accounts held in the employee's name.

Grievance and harassment policies – these policies encourage our employees to raise concerns regarding the behaviour and treatment of themselves and others.

Equal opportunities and code of ethics - these policies outline the expectations we have on how we should interact and behave towards each other and encourage a diverse and inclusive working environment.

Supplier practices

Due diligence – this is carried out on all new suppliers and include online searches to ensure that they have not been convicted of offences relating to modern slavery or breaches of human rights practices.

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Preferred supplier lists – only organisations who have passed our due diligence checks will be placed on our preferred supplier list.

Supplier employment practices - we require all suppliers to confirm their employees are paid a fair wage and comply with all local, national and international legislation concerning working conditions, working age requirements and any other relevant legislation.

Suppliers must be able to demonstrate compliance with this policy at the request and satisfaction of SpliceGroup and may be subject to an audit at our discretion.

Company practices

We operate a number of internal policies to assist with our compliance with the Modern Slavery Act. These include:

Code of Ethics - This policy provides guidance and information to our teams and those we do business with on our business ethics and how to act with integrity.

Sanctions Policy – we ensure we abide by financial and trade sanctions applied by individual countries, international organisations or regional bodies to fight aggression, terrorism, criminal behaviour or violations of human rights.

Policy effectiveness

We commit to training all employees involved in the recruitment of employees and suppliers in modern slavery and their responsibilities in its prevention.

We will keep a register of all organisations subject to due diligence checks within the year and maintain records of any suppliers found not to be complying, in addition to our preferred supplier list.

This policy and the practices associated with it will be reviewed on an annual basis.