

# Modern Slavery and Human Trafficking

#### Introduction -

Communications Plus Ltd is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chain. We recognise our responsibility to uphold human rights and ensure ethical labour practices in accordance with the Modern Slavery Act 2015 and other relevant legislation.

#### Scope -

This policy applies to all employees, contractors, suppliers, and business partners associated with Communications Plus Ltd. We expect all stakeholders to share our commitment to combating modern slavery and human trafficking.

#### Our Promise -

Modern slavery is completely unacceptable. At Communications Plus Ltd, we do not tolerate (directly or indirectly) child labour, threats, coercion, abuse, violence, or intimidation among our employees or in our supply chain.

# Legal & Regulatory Compliance -

Communications Plus Ltd complies with all applicable modern slavery laws, including but not limited to the UK Modern Slavery Act 2015. We require all our suppliers and business partners to comply with relevant labour laws and ethical standards.

# About Communications Plus Ltd -

Communications Plus is a trusted and valued provider of telecommunications solutions to businesses across the UK. From our Head Offices in Merseyside, Cheshire and the North East we offer Business Mobile deals and Sim only, Ultrafast Fibre, Leased Line broadband solutions and VoIP phone systems together with our award winning support.

#### Reporting & Accountability -

We encourage employees, suppliers, and stakeholders to report any concerns regarding modern slavery. All reports will be investigated, and appropriate action will be taken to address any violations.

# Our Employees -

At Communications Plus Ltd, we are committed to inclusion, diversity and providing opportunities for everyone, we are creating a workplace where everyone belongs. Our success would not be possible without our people, which is why it is so important we invest in and support their professional development. We believe in developing a culture in which our people are treated with dignity and respect at all times. There is no place for harassment in our workplace – everyone should feel safe.

We have been assessed by Investors in People to measure our overall culture which has resulted in Communications Plus Ltd receiving 'Investors in People' Platinum accreditation.

We aim to create an environment of open and honest communication with everyone having the opportunity to have their say. One key component of building a great workplace culture is ensuring that our people are able to speak freely and openly about any concerns or worries. We are always looking for ways to improve the communication between Communications Plus Ltd and our employees.

#### Examples include:

Our recruitment and employment practices – We continue to meet or exceed applicable employment laws and standards. We maintain our commitment to the values of integrity, respect and trust, and all employees are expected to demonstrate behaviour that lives up to these values.

Investors in People – We are proud to have achieved 'Investors in People' Platinum accreditation in 2024 which was maintained from 2021, exceeding Gold accreditation that was awarded to us in both 2018 and 2015.



Employee Engagement Survey - feedback from our people is a really important way of understanding how they feel about coming to work. We send out an employee engagement survey once a quarter, which is anonymous, to understand our people's views and concerns. We then make an action plan to address the main items and improve the working environment.

# Our Supply Chains -

We procure local goods and services to support our general business needs and functions. Where possible, we have built and maintained longstanding relationships with trusted suppliers/contractors, making clear our expectations of business behaviour. We expect our suppliers to adopt the same zero tolerance that we do to modern slavery. As part of our procurement process, any potential contractor or supplier is required to confirm that they comply with all applicable laws and regulations, including the Act. We would never knowingly engage with suppliers or contractors involved in slavery or human trafficking.

# Training and Awareness -

We believe that every employee of Communications Plus Ltd has a responsibility for supporting our modern slavery and human trafficking policy, and so our training is aligned with this. A specific modern slavery training module is available to every everyone in our employee online learning platform.

# Assessment of Modern Slavery risk within our supply chain -

We intend to perform a thorough risk assessment of our operations and supply chains in order to ensure that our efforts towards combatting modern slavery are targeted towards the highest risk areas. We intend to base this risk assessment not only on our own understanding of our supply chains, but also on publicly available research and information which identifies particular industries and countries which pose the biggest risk of human trafficking and modern slavery.

We believe that there is minimal risk in our supply chains. However, we are continuing to improve our processes, include reference to our zero-tolerance approach in relevant documentation with suppliers and also continue to encourage our employees to report any concerns that they have.

# Measuring the Effectiveness of the Policy -

At Communications Plus Ltd we believe this statement makes it clear that our attitude to modern slavery is one of zero tolerance. We have not implemented any compliance indicators as any instance of modern slavery or human trafficking by a supplier would be considered a breach of the policy.

Modern slavery is an ongoing risk. As such we are committed to continuously review and improve the effectiveness of the steps we take to prevent modern slavery in our business or in our supply chain.

Communications Plus Ltd is committed to continuously review and improve the effectiveness of the steps we take in preventing modern day 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 30th November 2025.

Stephen Roberts Managing Director For and on behalf of Communications Plus Ltd 1st December 2024