

# AVANTI COMMUNICATIONS GROUP

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

Avanti Communications Group plc and its affiliates and subsidiaries (**Avanti**) are committed to the prevention, deterrence and detection of slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken to achieve Avanti's stance of zero-tolerance of all forms of slavery, human trafficking, forced servitude and other exploitation in Avanti's supply chain or in any part of Avanti's business for the financial year ending 31 December 2020.

This statement has been approved by the board of Avanti Communications Group plc on 1 April 2021 and also applies to any affiliate or subsidiary of Avanti Communications Group plc.

### OUR BUSINESS

We are a world-leading provider of agile, secure and pioneering satellite technology across Europe, the Middle East and Africa. Avanti is headquartered in the City of London with offices across Europe, Africa and America. Avanti has approximately 200 employees worldwide.

### OUR SUPPLY CHAIN AND SUPPLIERS

Avanti's supply chain and its relationship has been established and improved. We have long-term technology partners, that are essential in the delivery of our global connectivity services and that we rely on each day to ensure customer satisfaction. We also utilise a range of professional services and logistics services.

Since 2018, we have a dedicated Procurement & Supply Chain team who, with the support of the Legal Department, seek to ensure we conduct our business ethically and in full compliance with all applicable laws. We proactively engage and manage our key suppliers centrally – ensuring that we understand their value chain, risk profile and country of origin. We apply the same standards whether they are local or global suppliers and have introduced a new supplier process to ensure all companies are appropriately vetted.

### OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy (**Policy**) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The current version of the Policy is publicly available to all employees, customers, suppliers and members of the public and is published on the Group's website at [www.avantiplc.com](http://www.avantiplc.com).

## RISK ASSESSMENT AND DUE DILIGENCE

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Risk assessments undertaken by the Procurement Department, with the support of the Legal Department, cover the following key factors: territory, sector, business type, transactions, outsourcing, level of spend, individuals involved and agency/partnership relationships.

To enhance the existing systems we have implemented a new supplier process which has as its primary intention the achievement of a transparent supply chain. The new supplier process includes the completion by all suppliers of a mandatory questionnaire on slavery and human-trafficking. Existing suppliers will also be requested to complete the questionnaire (to the extent they have not already done so). All suppliers will be sent an annual notification from Avanti reminding them of our zero-tolerance approach and directing them to refresh their awareness of our policy, posted on the Avanti website.

## SUPPLIER COMPLIANCE


Avanti requires that its suppliers are made aware of the Policy and may also be required to commit contractually to observe the Policy. Avanti's standard terms have been updated to require absolute compliance with the Modern slavery Act as a condition of contract. These terms provide that, in the event of any breach of slavery and human-trafficking laws or breach of the Policy, Avanti may in its sole discretion terminate suppliers' contracts.

## TRAINING

Avanti provides relevant employees with training on the scope and application of the Modern Slavery Act on an annual basis. All Avanti employees and suppliers should know how to identify or prevent slavery and human-trafficking and employees are encouraged to report concerns, and receive protection for doing so, pursuant to Avanti's whistleblowing policy.

## BOARD APPROVAL

This statement was approved by the board of Avanti Communications Group plc on 1 April 2021 and Kyle Whitehill was authorised to sign accordingly.



Kyle Whitehill  
Director and Group CEO  
Avanti Communications Group plc