



2026

# Modern Slavery & Human Trafficking Statement



# Modern Slavery & Human Trafficking Statement

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Ver.	Date	Updated By	Description of Change
1.0	01/04/2020	Brian McCombie	Document creation
2.0	04/08/2021	Helen Wright	Minor updates to Company characteristics
3.0	02/05/2022	Helen Wright	Review of policy. Minor updates to applicability and Company characteristics
4.0	19/09/2023	Helen Wright	Review of policy. Minor updates to Company Characteristics
5.0	08/07/2024	Helen Wright	Review of policy. Minor updates to company characteristics
6.0	06/08/2024	Helen Wright	Minor update to describe the due diligence process
7.0	10/04/2025	Helen Wright	Refresh of document to include KPIs and results
8.0	17/04/2026	Siggi Twinn	Updates to governance, supply chain due diligence, monitoring and reporting.

## Latest Document Approval and Authorisation

<b>Approved by:</b> Mike Port <b>Title:</b> Chief Information Officer	<b>Date:</b> 08/05/2026
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# Modern Slavery & Human Trafficking Statement

## Applicability

This statement is published in accordance with section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Wavenet Limited during the financial year 1 April 2025 to 31 March 2026

In compliance with Section 54(1) of the Modern Slavery Act 2015, as Wavenet met the turnover threshold specified in the Act in 2021, Wavenet must maintain a Modern Slavery & Human Trafficking Statement covering its business operations and will review this statement at least annually.

## Scope

This policy applies to all aspects of business conducted by Wavenet, and all external processes with which Wavenet interacts.

Modern Slavery & Human Trafficking Statement

Wavenet does not tolerate Modern Slavery & Human Trafficking in any part of its business or supply chains. This Statement sets out the steps taken by Wavenet to obtain assurance that Modern Slavery & Human Trafficking are not taking place within its operations or supply chains, and the measures in place to mitigate any associated risks.

## Our Business

Established in 2000 as a simple lines and calls business, Wavenet has grown through the last 25 years to become a respected, multi-award-winning provider of telecoms, security and technology solutions to thousands of businesses and enterprises across the UK. Wavenet is a managed service provider and has long-standing partnerships with some of the top technology providers on the planet.

Wavenet Limited is part of Thetis Topco Group and is a telecoms and technology company headquartered in the Midlands offering UK-wide service. The business has 10 Corporate offices, 9 Business continuity sites nationwide with 1,600 employees, 22,000 customers.

## Wavenet's Policies

Wavenet has documented HR policies which are strictly enforced. These policies prohibit practices that could lead to worker exploitation, including but not limited to threats of violence, harassment or intimidation, compulsory overtime, child labour, discrimination, and the confiscation of workers' original identification documents. Wavenet's HR framework also ensures employees are free to give notice to terminate their employment at any time and are supported by fair recruitment, employment, and grievance processes designed to promote decent working conditions.

Wavenet's Health & Safety Policy defines the controls in place for the ongoing protection of employee wellbeing, including controls for mental and physical health, thus limiting the likelihood of exploitation during periods of uncertainty of stress which may occur from time to time.

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Wavenet does not currently have a formal union but does have a Workers' Group made up of employees representing the interests of the entire workforce on a voluntary basis providing a channel for escalation and early identification of labour-related concerns.

The Workers' Group meets monthly and can escalate issues raised to the Senior Leadership Team.

## Governance & Responsibility

The Sustainability Team is responsible for operational implementation, with oversight provided by the Senior Leadership Team and escalation to the Board when material risks or incidents are identified. The Board of Directors and Senior Leadership Team hold overall responsibility for preventing Modern Slavery & Human Trafficking within Wavenet, while executive accountability resides with the Chief Operating Officer.

### Modern Slavery & Human Trafficking Risk Assessment Process

Risks and controls are reviewed at least annually as part of Wavenet's comprehensive sustainability and governance framework. Relevant information is reported via the Sustainability Dashboard and escalated as necessary.

## Our Supply Chains

Wavenet's supply chain primarily consists of suppliers based in the UK, with a smaller number of suppliers based in the United States. Many of Wavenet's key suppliers are well-established organisations and are themselves subject to the Modern Slavery Act 2015.

To manage risks in the supply chain, Wavenet requires contractual clauses within supplier agreements that mandate compliance with all applicable legislation, including the Modern Slavery Act 2015. Where required, suppliers are also asked to provide copies of their Modern Slavery & Human Trafficking Statements.

Wavenet takes a proportionate, risk-based approach to supply-chain due diligence, taking into account factors such as the type of goods or services provided, geographic location, and sector-specific risks. Where risks are identified, Wavenet engages with suppliers to ensure appropriate controls are in place and reserves the right to escalate concerns where standards are not met.

## Key Modern Slavery & Human Trafficking Risk Areas

Based on Wavenet's operations and supply chains, Wavenet recognises that potential modern slavery and human trafficking risks may arise in certain higher-risk areas. These may include outsourced labour, IT hardware manufacturing and logistics, facilities management services, and suppliers operating in sectors or regions where labour rights risks are more prevalent. Wavenet uses this risk assessment to inform its proportionate, risk based approach to supplier due diligence and monitoring.

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## Key Modern Slavery & Human Trafficking Controls

The following table summarises the key areas where Modern Slavery & Human Trafficking risks may arise within Wavenet's operations and supply chains, together with the associated controls in place.

Identified Risk Area	Potential Risk	Controls and Mitigations
Outsourced labour and contractors	Use of unfair labour practices, excessive working hours or inadequate worker protections	Supplier contractual clauses requiring compliance with applicable labour and employment legislation; documented recruitment and HR practices designed to prevent exploitation; whistleblowing and grievance mechanisms available to workers
IT hardware manufacturing and supply chains	Risk of forced labour or poor working conditions in upstream manufacturing	Risk-based supplier due diligence; expectation that key suppliers have their own Modern Slavery & Human Trafficking Statements; engagement with established vendors subject to UK Modern Slavery Act requirements
Logistics and facilities management services	Exposure to labour-intensive services with higher sector risk	Proportionate supplier assessments based on service type; contractual audit rights; escalation procedures where concerns are identified
Geographic or sector-specific exposures	Increased risk in regions or industries with elevated labour-rights concerns	Periodic review of supplier risk profile; ongoing monitoring and reassessment; targeted engagement with suppliers to ensure appropriate controls are in place

## Due Diligence

In order to comply with the policies described above, Wavenet has a due diligence process in place which includes the following steps:

- Wavenet maintains documented processes designed to remove any risk of Modern Slavery & Human Trafficking in any recruitment or other HR activity
- Wavenet makes ethics and sustainability policies available to all employees in a central location
- Wavenet runs mandatory periodic training and awareness activities within the Company for all staff and contractors
- Wavenet conducts assessments of potential risk areas in supply chains, monitors those risk areas and conducts full reassessments on a periodic basis

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- Wavenet audits contractual arrangements within supply chains, either on contract renewal or via separate instrument, cascading policy and controls to the supply chain to prevent child labour, slavery and human trafficking practices
- Periodically reviewing supply chains (including by audit) and the controls suppliers have in place to prevent child labour, Modern Slavery & Human Trafficking practices.

## Training & Awareness

Wavenet provides training and awareness activities to ensure employees and relevant contractors understand the risks of Modern Slavery & Human Trafficking and the controls in place to prevent it. Mandatory training is delivered periodically and is supported by wider sustainability and ethics communications.

The effectiveness of training and awareness activities is monitored through defined metrics, which are reported annually to the Board of Directors via Wavenet's Sustainability Dashboard.

## Monitoring & Reporting

Wavenet monitors the effectiveness of its approach to preventing Modern Slavery & Human Trafficking through defined metrics and internal review processes. Performance is reviewed at least annually and reported to the Board of Directors via Wavenet's Sustainability Dashboard.

Key indicators used to monitor effectiveness include:

- Reports received and evidence verified of Human Rights-related incidents within Wavenet's internal operations, supply chain, or customer base
- The percentage share of Wavenet's purchasing volume that has been assessed with regard to Modern Slavery & Human Trafficking risks
- The percentage of employees who have completed training on Modern Slavery & Human Trafficking in the last 12 months
- The percentage of scheduled internal audits completed to detect child labour, human trafficking, and forced labour

These indicators are reviewed annually to track trends, identify areas for continuous improvement, and inform future actions. Wavenet measures the effectiveness of its approach through training completion rates, supplier assessments, audit outcomes, and incident reporting.

No confirmed cases of Modern Slavery & Human Trafficking were identified within Wavenet's operations during the reporting period. In the next reporting period, Wavenet will continue to enhance supplier risk assessment processes, increase visibility of supply chain controls, and embed Modern Slavery & Human Trafficking awareness as part of broader sustainability training.

# Modern Slavery & Human Trafficking Statement

## Alignment with International Standards

Wavenet's approach to preventing Modern Slavery & Human Trafficking is informed by recognised international principles on responsible business conduct and human rights. This includes alignment with the UN Sustainable Development Goals, particularly SDG 8 (Decent Work and Economic Growth), which promotes safe, fair and dignified working conditions for all.

Wavenet's policies and practices are also guided by the UN Guiding Principles on Business and Human Rights and the International Labour Organization's core labour standards. These frameworks underpin Wavenet's commitment to respecting human rights, prohibiting forced labour and child labour, and promoting fair treatment and safe working conditions across its operations and supply chains. This approach also supports Wavenet's commitment to the United Nations Global Compact, particularly Principles 1-6 relating to human rights, labour standards, freedom of association and non discrimination.

[WAVENET.CO.UK](http://WAVENET.CO.UK)

**0344 863 3000**

Wavenet Limited  
One Central Boulevard  
Blythe Valley Park  
Solihull, West Midlands  
B90 8BG  
[enquiries@wavenet.co.uk](mailto:enquiries@wavenet.co.uk)

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