

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. and Constitutes COMPATEL Ltd's Slavery and Human trafficking statement for the financial year ending on 31st December 2018.

1. About Us:

COMPATEL Ltd ("COMPATEL", "Company") is a next-gen MVNO network offering innovative solutions and carrier-grade capability for cloud telephony. Our mission is to broaden existing operator service portfolios, connecting innovative companies with their global consumer base through locally-relevant telco products and trusted operator relations..

For further information on the Company, its business and operations please refer the Company's website: <https://www.compatel.com/>

2. Our policy on Modern Slavery:

"COMPATEL Ltd" ("We", "Us" or "Our")

Even though we do not have any employees, we are fully committed to a work environment that is free from modern slavery in accordance with the laws and regulations of the United Kingdom.

Modern Slavery is a criminal offence under the Modern Slavery Act 2015., and it can occur in various forms including: **slavery, servitude, forced or compulsory labour and human trafficking**, all of which include the deprivation of a person's (and adult or child's) liberty by another, as each of these terms is explained or defined in Modern Slavery Act 2015.

In COMPATEL, we have zero tolerance towards modern slavery and we are fully supportive of the Modern Slavery Act 2015. and its intention of tackling modern slavery, and we also acknowledge that businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation.

3. Our commitment:

We are committed to monitoring our practices to ensure that slavery and human trafficking are not taking place in any of our supply chains or in part of our business. This statement is our public commitment that no slavery or human trafficking will knowingly be permitted, supported or endorsed through our business or supply chains at any time.

We commit to ensuring our business practices are continuously reviewed and checked and we will apply a robust approach to the management of existing suppliers as well as identification and selection processes for all new suppliers to mitigate and manage any risks.

4. Our organisational structure and supply chains

COMPATEL Ltd is a company registered in England and Wales under company number 7456831 and is the parent firm to international network of member firms across more than 20 countries.

While COMPATEL Ltd's headquarter is in London, the Company is operating globally.

Across network of its subsidiaries, the Company has numerous suppliers across a wide range of sectors, including partnering with many of the global leaders in telecommunications, IT network and equipment suppliers.

In addition, the Company works with a number of professionals, consultants and contractors.

Further details about the organization and Company's partners can be found on Company's website: <https://www.compatel.com/>

5. Our policies

We seek from **our suppliers** to operate in full compliance with the laws of their respective country as a minimum.

In respect of **Human rights requirement**, COMPATEL supports the protection of human rights around the world and is guided by fundamental principles such as those set in the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) Core Conventions.

We encourage our suppliers to obey to standards set by international human rights, especially when it comes to workers' rights. **These behaviours and practices consider specifically:**

Health and Safety – provision of a safe and hygienic working environment that minimizes health and safety risks and supports accident prevention for all personnel,
Freely Chosen Employment- ensuring that all work is completed voluntarily. Personnel should not be forced, bonded, indentured or subject to threat or involuntary prison labour.

Avoidance of Child Labour- child labour should not be employed. The term "child" refers to any person less than 15 (or 14 where the law of the country permits) years

of age, unless the minimum age for work or mandatory schooling is stipulated as being higher by local law.

Working Hours- ensuring that all workers are entitled to work and be paid for a minimum level of working hours; that working hours are not excessive; and that maximum working hours comply with national laws.

Wages and Benefits- being responsible for employee compensation and payment of fair wages. All the employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher. Any overtime should be voluntary and compensated appropriately.

Employee Freedom of Association- respecting the rights of workers in relation to freedom of association.

6. Risk assessment

Since we currently operate with numerous suppliers globally, we recognize our role of influence in the global efforts to tackle modern slavery and human trafficking.

Even though the Key Performance Indicators (KPI's) have not been established yet, due to the nature of our business and our approach to governance, we assess that the risk of slavery and human trafficking in our business and direct supply chain is low, so we are focused on making sure that our direct suppliers carry forward our business principles into their supply chain.

7. Due Dilligence Process

As part of our commitment to identify and mitigate risk our due diligence includes the following:

- **CONTRACTS** - our standard contract templates include a condition that suppliers will comply with all applicable laws, the Modern Slavery Act 2015. included. This ensures that any commitments made at the due diligence stage are underpinned by a contractual requirement and legally enforceable.

Furthermore, in our contracts, we include clauses specifically relating to human rights and anti-bribery. These clauses include, amongst other things mutual commitments to respect internationally recognized human rights and to comply with applicable laws relating to bribery and corruption.

- **AUDIT** – Contractually we reserve the right to conduct periodical on-site audits with any of our suppliers, clients or partners, and furthermore to cease a business relationship with any if found that unacceptable practices are being employed.

8. Training

Bearing in mind that we do not have employees, we do not perform any training sessions.

Also, we are committed to provide focused training on our expectation with regards to modern Slavery and Human Trafficking to relevant staff, whenever the current conditions change.

9. Further steps

We acknowledge that the risks of modern slavery are dynamic and change quickly. Therefore, despite of our low risk of slavery and human trafficking assessment (in our business and supply chains as well), we aim to periodically review the effectiveness of the relevant policies and procedures that we have in place and we will continue with implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our business or supply chains. We will monitor and take continuous improvement approach to doing this and we will aim to prioritize improvement processes that will prevent our direct or indirect support for any act of modern slavery.

Going forward, we aim to develop KPI's and introduce methodologies to increase awareness for our people and our clients and we will seek to discontinue business with any first supplier found by the enforcement authorities to be involved in modern slavery.

10. Approval

This statement, which will be reviewed annually, has been approved by the Board of Directors of COMPATEL Ltd and signed on its behalf by:

A handwritten signature in blue ink, appearing to read "Deborah Anderson".

Deborah Anderson
Attorney

16th April 2019

