

Modern Slavery and Human Trafficking Statement for the financial year ended February 2019.

This statement is made by Instalcom Ltd pursuant to Section 54 of the Modern Slavery Act 2015 and applies to all of Instalcom Ltd's operations.

This is the first statement that Instalcom has produced under the Modern Slavery Act 2015, and should be read in conjunction with our Modern Slavery Policy.

We will report each year on a number of matters such as policy, training, due diligence processes and the effectiveness of measures taken to combat slavery and trafficking, to drive transparency and promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking.

Our Business

Instalcom's business is founded on the installation of cable route works, cable, ducting, bases and associated civil engineering works for the telecommunications, railway, cable television and public utility industries.

Modern Slavery and Human Trafficking

"Modern slavery" and "human trafficking" have been used as umbrella terms for the acts of recruiting, harbouring, transporting, providing, or obtaining a person for compelled labour or commercial sex acts through the use of force, fraud, or coercion. "Forced or compulsory labour" is defined in Article 2, International Labour Organisation Forced Labour Convention 1930, and "trafficking in persons" is defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (the Palermo Protocol).

Our Policies

Instalcom recognises both the business imperative and the moral obligation to carry out its activities in a socially responsible and environmentally sustainable manner, with due consideration given to human rights. Instalcom's aim is to contribute to a sustainable future through our employees, investments, services and business conduct. A suite of formal policies, including policies on Equal Opportunities and Fair Treatment, Corporate Responsibility and Human Rights, underpins this aim. Copies of these policies can be found on our website or through contacting Instalcom directly.

Governance

The Board of Instalcom is responsible for matters of corporate responsibility, including the issues of modern slavery and human trafficking. The Board and its committees review our policies and practices and address any issues which arise.

Supply Chain

Instalcom Ltd prides itself in carrying out much of our work in-house, but we do have a number of suppliers and subcontractors with which we operate. We believe the risk of modern slavery or human trafficking in our supply chains and procurement processes to be low given that our activities do not directly involve operations where modern slavery or human trafficking most commonly occur. However, all new subcontractors and suppliers, are asked to confirm that their organisation will comply with all relevant items of legislation and



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our policies and key suppliers are asked to provide evidence of their procedures to prevent modern slavery and human trafficking. The largest risk area we have identified is through the purchasing of personal protective equipment, much of which is produced in other countries. Our subcontractors are not permitted to further subcontract work without written permission from Instalcom and whilst this is rare, they are too required to ensure that their subcontractors apply compliant and fair policies on all issues, including modern slavery and human trafficking. Should any of our suppliers or subcontractors be found to breach of any such requirement, they will be removed from our approved subcontractor and supplier database.

Monitoring and Review

We will continue to monitor our supply chain in relation to slavery and human trafficking through regular reviews.

Training

To ensure that the risks of modern slavery and human trafficking in our supply chains and our business are understood, we will make training available to those members of staff who manage supplier relationships or manage any businesses where we consider there to be a higher risk of slavery. All in such roles are provided with a copy of our policy on modern slavery and human trafficking at induction and a copy of the company Project Management Guide, which details relevant all relevant procedures.

John McVeigh
Chief Executive
Feb 2019