

Modern Slavery Act Statement

- ▼ Terms and Conditions
 - ▶ Acceptable Use Policy
 - ▶ Asia-Pacific
 - ▶ Canada
 - ▼ Europe, Middle East, and Africa
 - ▶ Austria
 - ▶ Belgium
 - ▶ Bulgaria
 - ▶ Croatia
 - ▶ Czech Republic
 - ▶ Denmark
 - ▶ Switzerland
 - ▶ Germany
 - ▶ Estonia
 - ▶ Spain
 - ▶ Finland
 - ▶ France
 - ▶ Greece
 - ▶ Hungary
 - ▶ Iceland
 - ▶ Ireland
 - ▶ Italy
 - ▶ Lithuania
 - ▶ Luxembourg
 - ▶ Latvia
 - ▶ Morocco
 - ▶ Malta
 - ▶ Netherlands
 - ▶ Norway
 - ▶ Poland
 - ▶ Romania
 - ▶ Serbia
 - ▶ Russian Federation
 - ▶ Sweden
 - ▶ Slovenia
 - ▶ Slovakia
 - ▶ Ukraine
 - ▼ United Kingdom
 - ▶ Service Level Agreement
 - ▶ **Modern Slavery Act Statement**
 - ▶ Tax Principles
 - ▶ Modern Slavery Act Statement 2017
 - ▶ South Africa

UNITED KINGDOM MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR YEAR END 31 DECEMBER 2018

1: Opening statement from senior management

The Verizon Communications Inc. (NYSE: VZ) group of companies ("Verizon") is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain. The digital world promises a better, more connected life, and we are delivering it. We make it possible for people to stay in touch and businesses to connect with their customers. We work better because our team is comprised of people from diverse backgrounds and experiences. We work with suppliers who promise to follow the highest ethical standards.

This statement describes actions taken by Verizon in respect of supply chain due diligence in relation to modern slavery and human trafficking.

2: Structure of the organisation

Verizon European Holdings Limited in the UK owns Verizon operating entities in Europe, the Middle East and Africa including the UK operating entity Verizon UK Limited¹. This statement is submitted on behalf of, and applies to, Verizon European Holdings Limited and Verizon UK Limited. It also describes actions taken by Verizon on behalf of Verizon European Holdings Limited and its subsidiaries, in respect of supply chain due diligence.

Verizon European Holdings Limited had turnover of £2,381,232,804 for the 2018 fiscal year. To find out more about the nature of our business, please go to <https://enterprise.verizon.com/en-gb/>.

In order to provide our services, we contract with a broad range of suppliers including telecommunications equipment manufacturers, technology solutions providers, professional services organisations, outsourcing specialists, network engineering vendors and facilities management vendors. Contracting with suppliers and diligence activities with respect to our supply chains are conducted primarily by Verizon's central supply chain functions.

3: Policies

As part of our commitment to combating modern slavery, we have implemented and enforced the following policies: The Verizon employee Code of Conduct defines our ethical business practices.

<https://www.verizon.com/about/our-company/code-conduct>

Our Supplier Code of Conduct ("Supplier Code") defines the ethical business practices that our suppliers must adhere to.

<http://www.verizon.com/about/sites/default/files/Verizon-Supplier-Code-of-Conduct.pdf>
The Supplier Code has been developed by Verizon over many years. It reflects ILO labour standards, including those regarding the elimination of child labour and forced labour.

Our Supplier Code is the primary mechanism used by Verizon to ensure suppliers promote ethical conduct in the workplace, safe working conditions and the treatment of workers with respect and dignity. It is our general practice to incorporate the Supplier Code into our procurement contracts and purchase orders.

Under the Supplier Code, suppliers are required, and the public is encouraged, to report violations of the standards in our Supplier Code to the Verizon Group's Office of Ethics and Business Conduct through the Verizon Compliance Guideline at 844-VZGUIDE (844.894.8433) (within the U.S.), (+)800.0.624.0007 (outside the U.S.), through email at vzguide@verizon.com, or online at www.verizonguideline.com. Such reports may be made anonymously. Under the Supplier Code, suppliers are further bound to prevent any retaliation against whistle-blowers.

4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring



▶ VoIP Europe SLA
▶ Latin America
▶ United States
▶ Asia Pacific Service Agreement
▶ Product & Supply Agreement
▶ Global Latency and Packet Delivery SLA
▶ Monthly IP Latency Data
▶ Interconnection Policy for Internet Networks
▶ Internet Abuse Compliance Process

Our procedures and policies are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistle-blowers.

Verizon is engaged in an ongoing assessment of the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by reviewing with our supervisory procurement personnel areas of Verizon's supply chain that are (i) international and (ii) high-turnover in nature, and (iii) where Verizon had the greatest leverage to influence the actions of such supply chain. In most cases, the presence or degree of these risk factors is low enough that direct action is not taken. For example, for areas of the Verizon's supply chain that reflected such risks to varying degrees (logistics services in the Netherlands warehouse, customer services operations in Czech Republic) site visits, interviews with workers and evaluation of employee development programs performed by Verizon's Supplier Risk Office did not raise further concerns of modern slavery risk.



A similar exercise has been carried out in relation to providers of call center services for Verizon's Media business. In 2018, we initiated a site visit program for call center vendors supporting our main Verizon Wireless prepaid and post-paid services. The program completed visits to facilities in the Philippines and Jamaica, as well as several sites in the United States. The protocols for such visits include walk-throughs of the production floor, sampling reviews of HR records, review of worksite safety features, and other indicators of adequate employee treatment. We expect to add additional countries to this program in the future.

Verizon is a member of the Joint Audit Cooperation (JAC) program, an association of thirteen large telecommunications operators who share resources to develop and enforce standards and best practices within the information communication technology supply chain. The audit activities cooperatively assess and verify compliance with recognized labour, social and environmental standards, including with respect to forced labour, underage labour, and working hours. Reviews of pertinent records such as disciplinary log books, age/identity documents, facility rules and grievance records, along with worker interviews, make up part of JAC's audit process. Members of JAC fund shared assessments and audits of their common suppliers; audits are conducted by independent auditors. JAC reduces redundancy and increases efficiency in supply-chain audit approaches by auditing shared suppliers once per cycle, using uniform protocols and methods.



5: Risk and compliance

In general, we respond to suspected or actual violations of our Supplier Code in a flexible manner appropriate for the nature of the violation. While egregious violations can result, and have resulted, in Verizon exiting a supplier relationship, most noncompliance is addressed by investigation and, where appropriate, the establishment of a corrective action plan.

We take steps to identify the risk of modern slavery or human trafficking related to our vendors. The Verizon Business Risk Team who carry out due diligence on new and existing vendors for anti-corruption and reputational risk use search criteria related to modern slavery and human trafficking. Where they identify information that could be a risk factor they raise that to Legal for review. We arranged training for the entire Business Risk Team prior to implementation of this process.

6: Training

We train our procurement employees in recognising the risks of modern slavery and human trafficking in our business and supply chains, and to assist in the risk assessment described



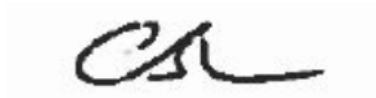
above. The training also focuses on the procurement team's role in interacting with suppliers to improve our due diligence. The training is currently delivered in live sessions by members of our Legal team. Most of the sourcing personnel at the supervisory level in Verizon have been given such live training.

7: Further actions

Verizon is in the midst of adopting a group-wide supplier risk management process and will consider ways to integrate controls relevant to modern slavery within it.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Verizon Enterprise Holdings Limited's slavery and human trafficking statement for the financial year commencing 1 January 2018 and ending 31 December 2018.

Signature:



Clare Aitkenhead

Director

Verizon European Holdings Limited



¹The scope of markets included in this Statement covers our operations in countries where we have operational control including: Austria, Belgium, Czech Republic, Denmark, Egypt, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, South Africa, Spain, Sweden, Turkey, the UK.

