

At Giacom, we understand the importance of complying with the Modern Slavery Act 2015 (the “Act”). We have, for several years, taken steps to ensure the requirements of the Act were implemented, not only throughout our business, but throughout our supply chain as well.

Today, as a standalone business, we are committed to running our business responsibly, with the same ethical principles that our customers and suppliers have come to expect. We continue to respect all human rights and encourage the highest possible standards throughout our supply chain. This statement describes our business and supply chain and how we operate them. We explain our current policies and practices and the plans to enhance these in support of the Act.

## Beliefs and Principles

We maintain our long-standing commitment not to use or accept forced, bonded or involuntary prison labour or child labour, nor do we demand deposits or hold onto our workers identity papers – or work with businesses that do. We only work with people who believe in the right to work freely.

We respect the right to equal opportunity, freedom of association and collective bargaining. These principles are integral to our approach to Environmental, Social, and Governance (ESG) and integrated with our Corporate Social Responsibility (CSR) programme. To ensure the voices of our team members are heard and to drive continuous improvement in this area, we have appointed an ESG Coordinator to lead our efforts and are actively fostering a collaborative environment for advancing our CSR objectives.

We welcome feedback from our employees and suppliers, including in relation to any suspicion or knowledge of unethical behaviour. We make it easy to report concerns either via their line manager, our Human Resources department or via our Risk and Compliance team. Additionally, we provide an independent whistleblowing service that enables staff to anonymously report concerns, including any for modern slavery or trafficking.

## Our Business and Supply Chain

We are a UK based provider of IT, telecommunications, and cloud services employing over 800 employees. The nature of our business requires us to engage with a wide range of suppliers to source items and services including our network and IT hardware through to our waste disposal services. Many of our supplies have their own suppliers which means that we are one part of a complex supply chain. In order to comply with the requirements of the Act, we prioritise our attention on companies that supply high value products or services, or things without which our business could not run.

## How We Monitor Compliance

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment process. Our recruitment policy is aligned to our principles outlined within our employee handbook and CSR Policy and applies to all people hired regardless of whether this is via our internal recruitment team or through the use of external agencies.

Once people join us, we give our new employees plenty of support, education, and training. All new starters are made aware of our ethical policies which are available through our intranet pages and are readily available to all employees. We have introduced our first ethical code of conduct that outlines our ethical standards for our employees, partners, and suppliers. In the coming months we will roll out that code of conduct to newly acquired companies. Failure to behave in an ethical manner whilst working on behalf of Giacom, in appropriate cases, will result in disciplinary action which could ultimately lead to dismissal.

Although there have been changes to the structure of our teams, our commitment to ensuring the adequate continuity of our compliance monitoring program has been prioritised. In the next twelve months we will place our supply chain under scrutiny and will review the effectiveness of our program and make improvements where appropriate.

## Measuring Our Progress

Throughout 2023/24 our business continued a period of integrating acquired companies. This change brought an exciting opportunity for us to review how we have embedded the requirements of the Act and to continue identifying new opportunities to improve.

### In 2023/24 we achieved the following:

- Sent questionnaires to suppliers asking them to adhere to the principles within our CSR policy.
- Aligned the business with four of the UN Sustainable Development Goals (SDGs). 1. No poverty; 4. Quality Education; 10 Reduced Inequalities and 13. Climate Action
- Began the review of our procurement procedures.

### In 2024/25 we aim to:

- Combine our ESG and CSR working groups to make them more effective.
- Continual review and improvement of our procurement procedures, aligning across the whole business.
- Carry out new Mandatory Modern Slavery training for all employees.

We will publicly report on our progress against these objectives in our 2025/26 statement. In the last year we have continued to ensure that our suppliers are bound by controls in respect of all applicable legislation, including the Modern Slavery Act. In the longer term, we will strive to continually improve and stay informed of best practices to continually improve anti-slavery measures. We will develop better ways of measuring the effectiveness of the steps we take to manage the risks associated with Modern Slavery.

**This statement is applicable from 1 August 2024 to 31 July 2025.**