

2023 – 2024



China Telecom (Europe) Limited
Modern Slavery Act Statement

Introduction from the Board

Since the enactment of the Modern Slavery Act 2015, China Telecom (Europe) Limited has consistently upheld its principles. We remain steadfast in our commitment to eradicating modern slavery and human trafficking across our operations and supply chain.

Our zero-tolerance approach to modern slavery is evident through the implementation of robust measures, including our comprehensive China Telecom (Europe) Anti-Slavery Policy ("the Policy"). This policy explicitly prohibits modern slavery and human trafficking within our business and supply chains.

In 2024, we are expanding our initiatives by incorporating regular office-based awareness campaigns, mandatory self-learning programs for all staff, and testing to reinforce knowledge and understanding of modern slavery issues.

For the financial year ending 31 December 2023, we are pleased to report no instances of modern slavery in our supply chains or business operations.

Organisation's Structure

As a telecommunications service provider operating across most European countries, China Telecom (Europe) Limited offers wireline and mobile telecommunications services, internet access, and related solutions.

We are a subsidiary of China Telecom Global Limited, headquartered in Hong Kong, which, in turn, is part of China Telecom Corporation Limited, one of the world's leading telecommunications providers. Globally, the China Telecom Group employs over 280,000 individuals, with more than 200 based in Europe.

Our Supply Chains

Our supply chains primarily involve reputable companies providing office supplies, professional services, data centre operations, and network equipment.

We acknowledge that supply chains can present risks, particularly in jurisdictions where laws and regulations differ from the UK.

To mitigate these risks, we implement a rigorous ethical framework that includes:

- Supplier pre-qualification processes, including compliance screening.
- Contracts with specific prohibitions against modern slavery and human trafficking.
- Ongoing monitoring and risk assessments.

These measures ensure alignment with our zero-tolerance policy, fostering collaboration and maintaining the highest ethical standards throughout our supply chain.

In 2024, we are enhancing supplier engagement by conducting regular audits, risk

assessments, and collaborative sessions with suppliers, especially those in higher-risk regions, to ensure compliance with our ethical standards and the prevention of modern slavery.

Our Policies on Slavery and Human Trafficking

We are committed to actively preventing modern slavery and human trafficking in our business and supply chains. Our Anti-Slavery Policy reflects our commitment to ethical conduct and integrity in all business relationships. It outlines:

- Clear prohibitions against modern slavery and trafficking in any form.
- A commitment to acting against any violations identified in our operations or supply chains.
- Whistleblowing procedures to protect individuals reporting concerns.

Due Diligence Processes for Slavery and Human Trafficking

We have established systems to identify, monitor, and mitigate risks of modern slavery, which include:

- Risk Identification: Assessing risks across operations and supply chains, focusing on high-risk industries and jurisdictions.
- Supplier Onboarding: Conducting due diligence checks on potential suppliers.
- Continuous Monitoring: Regularly reviewing supply chain practices, including audit programs where warranted.
- Remedial Actions: Collaborating with suppliers to address issues and, where necessary, terminating relationships with non-compliant suppliers.

Supplier Adherence to Our Values and Ethics

We require our suppliers to adhere to high standards of ethical conduct, particularly in jurisdictions where local laws may differ from the UK's. Our procurement process includes assessing potential suppliers for risks of modern slavery and reviewing their policies. Where appropriate, we incorporate specific prohibitions against slavery and trafficking into contracts.

In 2024, we are prioritising engagement with suppliers operating in higher-risk areas, ensuring they meet our ethical standards through enhanced due diligence and collaborative audits.

Training

This year we have enhanced our commitment to raising awareness by launching mandatory self-learning programs for all staff, coupled with assessments to ensure comprehension of modern slavery risks. Our comprehensive training covers:



- Recognising signs of modern slavery.
- Understanding human trafficking complexities.
- Familiarising staff with relevant legislation.

Through workshops, webinars, and resources, we aim to build an informed community dedicated to eradicating modern slavery.

Office Activities

To embed ethical values into daily operations, we are introducing awareness campaigns across our offices, including informational posters, themed discussions, and regular updates in team meetings. We are also incorporating modern slavery awareness into team-building activities and company-wide events.

These initiatives aim to cultivate a vigilant and informed workforce actively contributing to the fight against modern slavery.

Measuring Effectiveness

We continually review the effectiveness of our anti-modern slavery measures through annual evaluations, identifying opportunities for improvement, including:

- Percentage of employees completing mandatory training and assessments.
- Number of suppliers signing compliance agreements/passing compliance screening check.
- Frequency and scope of supplier audits and risk assessments.
- Instances of identified risks and actions taken to address them.

Formal reviews are conducted annually, and results are used to identify areas for improvement.

This statement, pursuant to section 54(1) of the Modern Slavery Act 2015, constitutes our Company's slavery and human trafficking statement for the financial year ending 31 December 2023.

Approved by the Board of Directors on 16 December 2024.

Jun Xian, Managing Director
China Telecom (Europe) Limited
Date: 16 December 2024