Docusign Envelope ID: 4805CF48-B14A-84CF-82F1-90F84A2701B7

Modern Slavery and Human Trafficking Statement

Telcom Networks Limited trading as Elevate
Company Number: 09085579
Northstar, 135–141 Oldham Street, Manchester, M4 1LN

Our commitment

Telcom Networks Limited, trading as Elevate ("Elevate"), is committed to conducting business responsibly, ethically and with respect for human rights. We have zero tolerance for modern slavery, human trafficking, forced labour or exploitation within our own operations or supply chains.

Elevate is part of Telcom Group Limited and operates within the Group's wider governance framework. This statement should be read alongside Telcom Group's Commitment to Respecting Human Rights, which recognises our responsibility to respect and protect the rights of individuals affected by our operations, supply chains and business relationships.

Although Telcom Networks Limited is not currently a relevant commercial organisation for the purposes of section 54 of the Modern Slavery Act 2015, we recognise the importance of the principles underpinning the Act and are committed to maintaining appropriate measures to identify and manage modern slavery risks.

Our organisation, business and supply chain

Elevate is a UK telecommunications and network services provider, employing approximately 140 people.

Our supply chain supports the design, delivery, operation and maintenance of telecommunications and network services and includes:

- telecommunications carriers and network infrastructure providers;
- hardware, equipment and technology suppliers;
- civil engineering, installation and field-service subcontractors; and
- professional and other service providers.

We recognise that modern slavery risk can extend beyond our direct workforce into supply chains and subcontracted activities. Our controls therefore apply not only to our own employment practices but also, where appropriate, to the organisations engaged to deliver services on our behalf.

Policies and governance

Our approach to preventing modern slavery and protecting human rights is supported by a range of Group and company policies and controls, including our:

- Human Rights Commitment;
- Whistleblowing Policy;
- Code of Conduct;
- Equality and Diversity Policy;
- Supplier Code of Conduct; and

Docusign Envelope ID: 4805CF48-B14A-84CF-82F1-90F84A2701B7

- recruitment and wider HR policies and procedures.

These policies establish expectations regarding ethical conduct, fair treatment, responsible procurement and the escalation of concerns.

Our existing Human Rights Commitment specifically recognises our responsibility to identify, assess and address potential human-rights risks across our business and to consider the impact of our operations, supply chains and business relationships.

Due diligence and supply-chain controls

We take a risk-based approach to supplier and subcontractor management.

Subcontractors engaged to undertake work on behalf of Elevate are subject to Group onboarding and compliance processes. These include the use of AFS, contractual terms and conditions, operational reporting and appropriate compliance requirements. SafeContractor accreditation and associated controls are also used within our contractor management arrangements where applicable.

Our approach enables us to assess organisations before and during engagement and establish clear expectations regarding standards of conduct and compliance.

Material and equipment suppliers are managed through our wider procurement and supplier-management processes, with proportionate due diligence applied according to the nature of the supplier and services or products being provided.

Risk assessment and management

We recognise that modern slavery risks may be greater in areas involving extended supply chains, subcontracted labour, civil engineering, installation and field-based activities, and the manufacture and supply of telecommunications equipment.

We seek to manage these risks through supplier selection and onboarding, contractual requirements, supplier and subcontractor governance, appropriate accreditation and compliance checks, and ongoing operational oversight.

Employees are expected to raise any concern relating to potential unethical working practices, exploitation or modern slavery with their line manager or HR. Concerns can also be addressed through our formal whistleblowing arrangements.

Any concern raised would be investigated and appropriate action taken, including escalation within the business and action in relation to the relevant supplier or subcontractor where required.

Measuring effectiveness

At the date of this statement, no instances of modern slavery or human trafficking have been reported or identified within Telcom Networks Limited or its supply chain.

We will continue to monitor the effectiveness of our controls through our existing supplier-management, HR, compliance and governance arrangements.

Measures used to assess effectiveness include:

Docusign Envelope ID: 4805CF48-B14A-84CF-82F1-90F84A2701B7

- completion of mandatory employee training;
- supplier and subcontractor onboarding and compliance;
- concerns or incidents raised through management, HR or whistleblowing routes;
- identified breaches of relevant supplier or company policies; and
- actions taken in response to identified risks or concerns.

Our approach will continue to evolve as our business, supply chain and associated risks develop.

Training and awareness

Employees undertake Modern Slavery and Human Trafficking training through our ConnectED online learning platform.

Training is refreshed annually, helping employees understand modern slavery and human trafficking risks, recognise potential warning signs and understand how concerns should be raised within the business.

Relevant policies and guidance are made available to employees through our internal systems.

Review and continuous improvement

We are committed to continually reviewing our approach to modern slavery and responsible supply-chain management.

This statement will be reviewed at least annually, taking account of changes to our operations, supply chain, identified risks and applicable legislation and guidance.

This statement has been reviewed and approved by the appropriate senior management of Telcom Networks Limited.

Signed: Signed by: Thom Seddon 2DB23FED1D1C487...

Name: Thom Seddon

Position: CTO

Date: 29/9/2026

For and on behalf of Telcom Networks Limited t/a Elevate