

2022 – 2023



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 championed the principles of the Act. We maintain a steadfast commitment to eradicating modern slavery from both our business operations and supply chain. Our unwavering dedication to this cause is evident in the zero-tolerance approach we adopt towards modern slavery and human trafficking.

We take pride in the robust measures we have implemented to combat slavery and human trafficking, exemplified by the China Telecom (Europe) Anti-Slavery Policy ("the Policy"). This policy serves as a comprehensive framework, strictly prohibiting the use of modern slavery and human trafficking in our operations and supply chains.

Our pledge is reinforced through ongoing commitment to implementing systems and controls designed to ensure that modern slavery finds no place within our organisation or any part of our supply chains. We prioritise instilling a shared responsibility and adherence to our values among those we engage with, particularly our suppliers and representatives, to prevent slavery, servitude, and forced or compulsory labor.

For the financial year ending 31 December 2022, we are pleased to report that no instances of modern slavery were identified in either our supply chains or business operations.

Organisation's structure

As a telecommunications service provider covering most European countries, we offer wireline and mobile telecommunications services, internet access, and related telecommunications services. China Telecom (Europe) Limited operates as a subsidiary of China Telecom Global Limited, headquartered in Hong Kong, which, in turn, is a subsidiary of China Telecom Corporation Limited—one of the world's leading telecommunication service providers. The China Telecom Group employs over 280,000 individuals worldwide, with more than 300 in the Europe region.

Our supply chains

The majority of our supply chains are comprised of prominent companies engaged in office supplies and administration, professional services, data center provision, and network equipment supply.

To fortify our supply chain against modern slavery and human trafficking, we enforce a robust ethical framework. Proactively, we require suppliers to commit to comprehensive compliance agreements and undergo compliance screening checks. These not only formalise our shared commitment to zero tolerance but also establish a blueprint for ethical conduct throughout our supply chain. By fostering collaborative partnerships and integrating training provisions within these agreements, we aim to create a supply network that collectively upholds the highest standards of integrity, ensuring a resilient defence against the threat of modern slavery in all aspects of our operations.

Our policies on slavery and human trafficking



We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

Supplier adherence to our values and ethics

With zero tolerance for slavery and human trafficking, we hold our suppliers to high standards, especially in low-risk industries. Ongoing risk assessments and due diligence processes ensure our suppliers align with our high standards.

We consider that our supply chains are all at low risk of modern slavery, given that they largely involve professional services and/or low-risk industries such as the provision of data centres and the supply of network equipment.

However, we note that care must always be taken dealing with suppliers in jurisdictions without laws and regulations equivalent to those in the UK.

As part of our ongoing risk assessment and due diligence processes, we have incorporated procedures into our procurement process to ensure that our suppliers share our high standards. This involves us undertaking an assessment of potential suppliers to determine if there may be a risk of modern slavery and what policies and procedures are in place to prevent such a risk. We also consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Policy.

We also assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Policy, which sets out the minimum standards required to combat modern slavery and trafficking.

If we find that other individuals or organisations working on our behalf have breached our Policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remedied and whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships.

Training

In our unwavering commitment to combat modern slavery and human trafficking, China Telecom (Europe) Limited places a strong emphasis on targeted training initiatives to equip our employees, suppliers, and partners with the knowledge and tools necessary to identify and address instances of exploitation. Our comprehensive training programs cover topics such as recognising the signs of modern slavery, understanding the complexities of human trafficking, and familiarising participants with relevant legislation and international standards. In 2023, the company continues the training delivery and the modern slavery-related tests for our staff. Through regular workshops, webinars, and resources, we aim to cultivate a vigilant and informed community within our organisation and supply chain. Furthermore, we actively encourage open communication channels, providing avenues for reporting any concerns related to potential instances of exploitation. By prioritising education and awareness, the company is dedicated to building a resilient and knowledgeable network that actively contributes to the eradication of modern slavery and human trafficking in all facets of our operations.

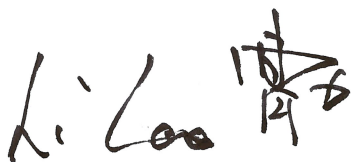
Office Activities

Within our office activities, we are dedicated to embedding a strong ethical foundation that actively combats modern slavery and human trafficking. We integrate these values into our daily work environment through awareness workshops, training sessions, and informational campaigns. Our employees actively participate in events fostering dialogue and understanding. By incorporating discussions on modern slavery into team-building activities and social events, we aim to raise awareness and create a vigilant and informed workforce.

Measuring Effectiveness

We commit to continually monitoring the effectiveness of our efforts, conducting formal reviews annually to identify areas for improvement.

This statement, pursuant to section 54(1) of the Modern Slavery Act 2015, constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2022. Approved by the board of directors on 5th December 2023.



Li Cao, Director
China Telecom (Europe) Ltd
Date: 8th December 2023