

2024 – 2025



China Telecom (Europe) Limited  
Modern Slavery Act Statement

## Introduction from the Board

Since the introduction of the UK Modern Slavery Act 2015, China Telecom (Europe) Limited has remained steadfast in its commitment to preventing modern slavery and human trafficking in all aspects of our business and supply chains. We uphold a strict zero-tolerance approach and continue to strengthen internal governance, supplier oversight, and staff awareness.

For the financial year ending 31 December 2024, we are pleased to confirm that no incidents or indications of modern slavery or human trafficking were identified across our operations or supply chains. Internal reviews conducted through our audit and compliance processes — covering procurement, employment practices, and general business operations — found no violations or concerns.

In 2025, we continue to reinforce our commitment by:

1. Enhancing internal communication and visibility of anti-modern-slavery information through regular office-based awareness campaigns.
2. Strengthening internal audits, including self-checks focused on procurement, labour practices, and third-party engagements. No irregularities have been found in 2025 to date.
3. Implementing mandatory self-learning modules and assessments for all new employees, ensuring a baseline understanding of modern slavery risks and compliance responsibilities.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and outlines the actions we have taken during 2024 and those planned and implemented in 2025 to prevent modern slavery in our business and supply chains.

## Organisation's Structure

China Telecom (Europe) Limited is a telecommunications service provider operating across most European countries. Our services include wireline and mobile telecommunications, internet access, ICT solutions, and other network-related services.

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

## Our Supply Chains

Our supply chains primarily include reputable suppliers of:

- Office supplies and facilities services

- Professional and consulting services
- Data centre operations
- Network infrastructure and equipment

We recognise that modern slavery risks can vary across regions and sectors. To mitigate these risks, our Company maintains a rigorous ethical governance framework that includes:

- Pre-qualification and compliance screening of suppliers
- Contractual clauses prohibiting 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.

During 2024 and continuing through 2025, we have strengthened supplier engagement through regular audits, updated compliance documentation, and targeted risk assessments to ensure alignment with our zero-tolerance policy.

### **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:

- Strict prohibitions of all forms of modern slavery and human trafficking
- Our commitment to identifying and addressing risks
- Processes for reporting concerns, including whistleblowing protections
- Responsibilities of employees, management, and suppliers in ensuring compliance

### **Due Diligence Processes for Slavery and Human Trafficking**

We maintain robust systems to identify, assess, and mitigate modern slavery risks within our operations and supply chains. These include:

- Risk Identification: Ongoing assessments focused on high-risk industries, jurisdictions, and supplier categories.
- Supplier Onboarding: Mandatory due diligence checks before establishing any commercial relationship.
- Continuous Monitoring: Periodic reviews, compliance questionnaires, and audits where required.
- Remedial Measures: Collaborative corrective actions or termination of supplier relationships when non-compliance is identified.

Across both 2024 and 2025 to date, no risk indicators or incidents have been identified through our due diligence activities.

### **Supplier Adherence to Our Values and Ethics**

Our suppliers are required to comply with strict ethical standards, including explicit prohibitions on forced labour, child labour, and human trafficking. As part of our procurement process, suppliers are assessed based on:

- Their own anti-slavery and human rights policies
- Compliance records
- Risk profiles related to geography and industry

### **Training and Awareness**

Our company is committed to building an informed and vigilant workforce. Our training initiatives include:

- Mandatory anti-modern-slavery self-learning and assessments for all new employees.
- Company-wide awareness campaigns, including posters and informational materials in office areas.
- Training resources to help staff recognise signs of modern slavery and understand reporting procedures.

### **Office Activities**

To further integrate ethical awareness into daily operations, we have expanded internal communication initiatives in 2025, including:

- Posters and educational materials displayed across common areas
- Modern-slavery-related content incorporated into internal meetings
- Regular reminders reinforcing ethical expectations

### **Measuring Effectiveness**

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

- Training completion rates
- Supplier compliance screening and contractual adoption
- Internal audits and risk assessments
- Whistleblowing reports (none in 2024 or 2025 to date)

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



improvement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024.

Approved by the Board of Directors on 11 December 2025.

Jun Xian, Managing Director  
China Telecom (Europe) Limited  
Date: 11 December 2025