

TELEFÓNICA TECH UK&I LIMITED: Anti-Slavery and Human Trafficking Statement 2025

1. Introduction

In compliance with the Modern Slavery Act 2015 (“MSA”), Telefónica Tech UK&I Limited makes the following statement regarding its efforts to prevent slavery and human trafficking in its business and supply chain.

2. Organisation Structure

Telefónica Tech UK&I Limited is the parent company of the Telefónica Tech group companies (“Telefónica Tech Group”). Telefónica Tech UK&I was incorporated on 8th March 2018. Telefónica Tech UK&I does not trade and has no employees.

Telefónica Tech Group consists of several subsidiaries including the following which have a turnover in excess of £36 million: Telefónica Tech UK Limited and Telefónica Tech Northern Ireland Limited.

3. Telefónica Tech Group business and supply chains

Telefónica Tech Group is a Systems Integrator, dedicated to enabling its customers to achieve strong results and success across consultancy, cloud, on-premises and managed services solutions. Everything we do is working towards delivering a successful, efficient, growing business that works for you today and into the future. To enable this, we have the best partnerships with leading vendors, many of whom have recognised Telefónica Tech with their Partner Awards.

Telefónica Tech Group collaborates with various technology partners (including technology manufacturers, developers, distributors and integrators) to provide end-to-end solutions for our customers. A list of these partners can be found here: <https://telefonicatech.com/en/wearetech/partners>.

4. Policies in relation to slavery and human trafficking

Telefónica Tech Group adheres to Telefónica’s Code of Conduct and Responsible Business Principles policy a copy of which accessible to all employees. In 2026, we will begin introducing these policies into our supply chain to strengthen ethical standards and accountability. This policy constitutes our code of ethics and conduct. The policy includes a guarantee that all employees have their labour rights respected and confirms that we do not tolerate forced labour, threats, coercion, abuse, discrimination, violence or intimidation, or child labour in our work environment. There is also an undertaking to ensure that our compensation is fair and appropriate to the labour markets in which we operate and to guarantee this we use indicators that measure our employees’ compensation against the wider market. In addition, our remuneration policies are based exclusively on merit and ability in relation to the job requirements.

5. Due diligence processes

In order to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, Telefónica Tech Group's procurement department assesses each supplier before that supplier is on-boarded. Where there is a potential risk of slavery and human trafficking due to the location of the supplier for example, this supplier would either be rejected, or the potential risk discussed by senior key stakeholders during the Supplier Board meeting.

The Supplier Board consists of the CEO, VP of Sales, VP of Business Operations, Head of Legal and Head of Procurement. The Supplier Board has the power to veto the on-boarding of suppliers and may do so in circumstances where human trafficking and slavery are suspected.

Telefónica Tech Group has a standard set of supplier terms and conditions located here <https://info.telefonicatech.uk/supplier-terms-and-conditions> which require the supplier to implement due diligence procedures to ensure adherence to the MSA. Any breach of these terms or the MSA allows Telefónica Tech Group to terminate the agreement with the supplier. We evaluate whether our procurement processes are identifying higher-risk suppliers and applying appropriate controls.

Our recruitment policy complies with all applicable legislation including ensuring the right to work, validity of documents and work permits for foreign workers. We do not employ child workers in any of our locations in the UK or overseas. Right to work checks are undertaken for all employees, temporary workers and contract staff.

6. Risk assessment and measuring effectiveness

Key stakeholders within Telefónica Tech Group (including Legal, Procurement, Compliance and HR) meet every year and at other times when there is a change in the law to discuss any new legislation, concerns and best practice in relation to reducing our exposure to the risk of modern slavery occurring in our business and supply chain.

Where we have identified any potential risks, these risks would be investigated and mitigated through activities such as due diligence, the introduction of new procurement procedures or perhaps enhanced vetting of a particular supplier.

7. Training and Further Actions

Telefónica Tech Group continues to be committed to social responsibility and does not tolerate slavery and human trafficking. During 2025 Telefónica Tech Group introduced a mandatory anti-slavery awareness course as part of its induction process for new employees which will also be available within our learning management system throughout the year to all employees. We are working on a KPI completion rate for such training, with completion rates being actively monitored and non-compliance escalated. Going forward all employees will be required to complete this anti-slavery awareness course every other year.

Telefónica Tech Group reviews and investigates all employee input in relation to modern slavery matters. This statement is made in accordance with section 54(1) of the MSA and constitutes Telefónica Tech Group's anti-slavery and human trafficking statement. It was approved by the Board of Directors on10 February 2026

Signed on behalf of Telefónica Tech UK&I Limited



Martyn Bullerwell

Director

Date: 10/02/26

