

# Modern Slavery Statement

2024-2025





# 2024-2025 Highlights



**Extended the roll-out of our supplier onboarding system to our existing supplier base** (previously only new suppliers were required to register) to capture more detailed information from our suppliers in relation to modern slavery and ensure that they meet our requirements.



**Exceeded our ESG assessment target. We increased coverage of our supplier sustainability assessments from 91% to 98% of spend against a target of 95%**, enabling us to better understand the supply chain practices across a broad range of sustainability topics, including Labour and Human Rights.



**Performed additional due diligence on Tier 1 suppliers** identified as higher risk by carrying out targeted reviews.



**Rolled out mandatory sustainability training to all employees**, which also covered modern slavery.

# CEO Message



Three is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and its supply chain. This commitment, using our Group Sustainability Framework to guide our strategy on sustainable development across our operations, is embedded in Three's approach to Sustainability where, through our five goals covering **Take Action on Climate Change, Promote a Circular Economy, Create Great Places to Work, Create a Thriving Digital Economy, and Operate Responsibly and With Integrity**, we are 'committed to building a better-connected world to enable a more sustainable and inclusive future'.

"Three has a **zero-tolerance approach to modern slavery** and we are committed to acting ethically and with integrity in all our business dealings and relationships. We also expect the same high standards from all our contractors, suppliers, and business partners, regardless of the type and value of business we do together."

We will continually improve our processes to identify and mitigate the risks of modern slavery across our business and supply chain.

This Statement was approved by the Three Board of Directors on 28 April 2025 and signed on its behalf by:

**Robert Finnegan**  
Chief Executive Officer  
Hutchison 3G UK Limited  
April 2025



# Organisation Structure, Business and Supply Chain.



## Our Structure

Three is part of the CK Hutchison Holdings Limited (“CK Hutchison”) group of companies, a multinational conglomerate which operates a variety of businesses in about 50 countries / markets across the world with over 300,000 employees. CK Hutchison is listed on The Stock Exchange of Hong Kong Limited.

CK Hutchison has **four core businesses:**



**1** Ports and related services



**2** Retail



**3** Infrastructure



**4** Telecommunications

# Our Supply Chain



Three's procurement activities are led by our UK-based procurement team. We work with a range of suppliers, providing goods and services from a variety of sectors, including **network and telecoms services, IT and hardware, handsets and devices, marketing and other professional services.**

We recognise that the highest risk areas of our supply chain are our offshore outsourced service providers and the wider supply chains for our IT hardware and handset device manufacturers.

**These suppliers are managed by dedicated teams at Three who focus on delivery, compliance and management of risks and relationships.**

We have analysed in further depth those additional areas of risk set out on **page 9**, as part of our 'Risk Assessment' analysis.

# Our Operations



Three is active in the Information and Communications sector and provides mobile telecommunications and data services to consumers, businesses and the wholesale market in the UK.

Three's vision is better connectivity, every day, for every customer.

**Three has 10.5 million active customers and our network today covers 99% of the UK population and carries 34% of the UK's mobile data traffic.**

figures correct at March 2025

We own and operate a UK mobile network infrastructure, including:

- A leading mobile network, comprising more than 18,400 mast sites providing the UK's fastest 5G network.\*

\*based on analysis by Ookla® of Ookla Speedtest Intelligence® data for Q3-Q4 2024]

- Three has the **UK's leading 5G spectrum holdings**, we are the only operator able to meet the International Telecoms Union (ITU) 2020 standard for full 5G services.



**The UK's  
Fastest 5G  
Network**

In addition to providing services directly to end users via our Three and SMARTY brands, we also provide wholesale services to several mobile virtual network operators.

To ensure mobile services can be provided globally, and our customers can access their services while abroad, we have roaming and interconnect relationships with numerous network partners across the world.

Three employs more than 4,800 people across our offices in Reading, Glasgow and about 300 retail stores.

Additionally, we have an indirect workforce of customer service agents, IT and network operations and support staff, through several strategic partners.



# Governance and Policy

## Governance

Three's Modern Slavery Working Group is responsible for ensuring the business' compliance with the Modern Slavery Act, identifying opportunities to improve, and ensuring these are delivered.

Three has continued to operate our cross functional Modern Slavery Working Group, enabling us to embed knowledge and responsibilities deeper within our business functions. Our objectives, responsibilities and success criteria are set out in the Working Group's Terms of Reference.

Three UK has also set up a Sustainability Committee comprising representatives from across the business. The committee is mandated to meet at least quarterly and is chaired by the People Team Business Manager, who has delegated responsibility from the Chief People Officer. **Operate Responsibly and with Integrity** is one of Three's sustainability strategy goals and is a core focus of the Sustainability Committee. Responsibilities of the committee include monitoring and reporting on our progress towards our sustainability strategy targets.

## Policy

Three has in place a range of policies that support our approach to combating modern slavery. Underpinned by our Anti-Slavery Policy and Supplier Code of Conduct, these policies define how we work and outline the expectations of our people and our suppliers. They also provide a route to report where we have concerns that our standards may not be being met. These policies are set out in the following table.

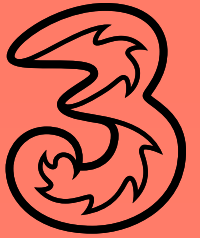


# Governance and Policy

Policy / Document	Description
<b>Anti Slavery Policy</b>	Our Anti-Slavery Policy is relevant to all employees, contractors, external consultants and other third parties engaged by Three. It promotes awareness and detection of modern slavery while providing information on reporting requirements and monitoring activities. The policy sets out our commitment to preventing modern slavery and human trafficking, and prohibits any form of forced or compulsory labour in our business and operations.
<b>Supplier Code of Conduct</b>	Our Supplier Code of Conduct sets out the standards which suppliers are required to meet when entering into new contracts with Three. These standards are further embedded in our standard contract terms and suppliers are required to confirm their compliance with the Supplier Code of Conduct as part of the onboarding process. Our Supplier Code of Conduct prohibits any form of slavery, servitude, forced or compulsory labour and/or human trafficking. To ensure that our suppliers are committed to complying with our Supplier Code of Conduct we request that they make any third parties providing services to them aware of our anti-slavery and human trafficking policies and procedures (see <a href="https://three.co.uk/terms-conditions/code-of-conduct">three.co.uk/terms-conditions/code-of-conduct</a> ). Three regularly reviews and updates its Supplier Code of Conduct in order to improve and adapt to evolving market conditions.
<b>Employee Code of Conduct</b>	Our Employee Code of Conduct is relevant to all employees and sets out the minimum standards of conduct that we require from our people and serves as a foundation for our Company policies, processes and guidelines. In relation to modern slavery, it highlights our commitment to preventing modern slavery from occurring within our business and supply chain; provides links to our policy and statement; and reminds people that they have a duty to report if they have any suspicions of modern slavery taking place.
<b>Diversity and Inclusion Policy</b>	This supports us in eliminating discrimination by promoting diversity, inclusion and equality amongst our employees and eradicating unlawful and unfair discrimination in recruitment, training, working conditions, pay, promotion and any other aspect of employment.
<b>Whistleblowing Policy</b>	Our Whistleblowing Policy aims to encourage a culture of transparency which enables our people to raise concerns about how Three does business, challenge poor practices and behaviours, and report business wrongdoing confidentially, including any instances of modern slavery and human trafficking.
<b>Anti-Bribery Policy</b>	The Anti-Bribery Policy makes it clear to our employees what their responsibilities are when it comes to acting with integrity and honesty. It also provides a route through which they can report any concerns.



# Risk Assessment



**Assess**



**Manage**



**Measure**

## **Assessment**

During the period of this Modern Slavery Statement, we have identified and focused on the following priority risk areas in our supply chain – high-risk industries and high-risk countries.

High-risk countries often have high numbers of low-skilled or migrant workers and their governments may have fewer controls to combat modern slavery. As a result, there is an increased likelihood of workers being exploited in their attempts to secure work. We use a range of reports and surveys to aid our assessment of the risk profile for those countries that our suppliers and their supply chains are associated with.

# When assessing risk areas, Three carefully considers the structure of our supply chain.

We adopt the following 3-tier model:



## Tier 1

Suppliers with whom we have contracts to provide goods and services. Three has around 750 Tier 1 suppliers, all of whom we assess based on our risk criteria, including industry, location and products or services provided

## Tier 2

These companies provide services to our Tier 1 suppliers. They are generally a combination of manufacturing and assembly - typically within the electronics sector

## Tier 3

Lower tiers are responsible for providing individual components and raw materials to Tier 2



# Risk Assessement



While it is relatively straightforward to identify our Tier 1 suppliers, it becomes more challenging to identify other suppliers further down the supply chain as we have less influence over them.

In our risk assessment process, we take into account that where there is a combination of risk factors, the potential risk of modern slavery existing is likely to be higher. The vast majority of our direct suppliers (Tier 1) are UK based and may be of low risk. However, the supply chains of many technology suppliers will include elements of the risk areas listed below due to the nature of their supply chain, which is more likely to involve industries such as raw material extraction.

Based on our risk assessments, we have identified the areas of our supply chain below as having a higher risk associated with them. These include:

- **Manufacturing of telecommunications network equipment and devices;**
- **Facilities services, including security, cleaning and catering;**
- **Textiles, clothing & garment industry for the provision of uniforms and Personal Protective Equipment; and**
- **Construction and engineering services.**

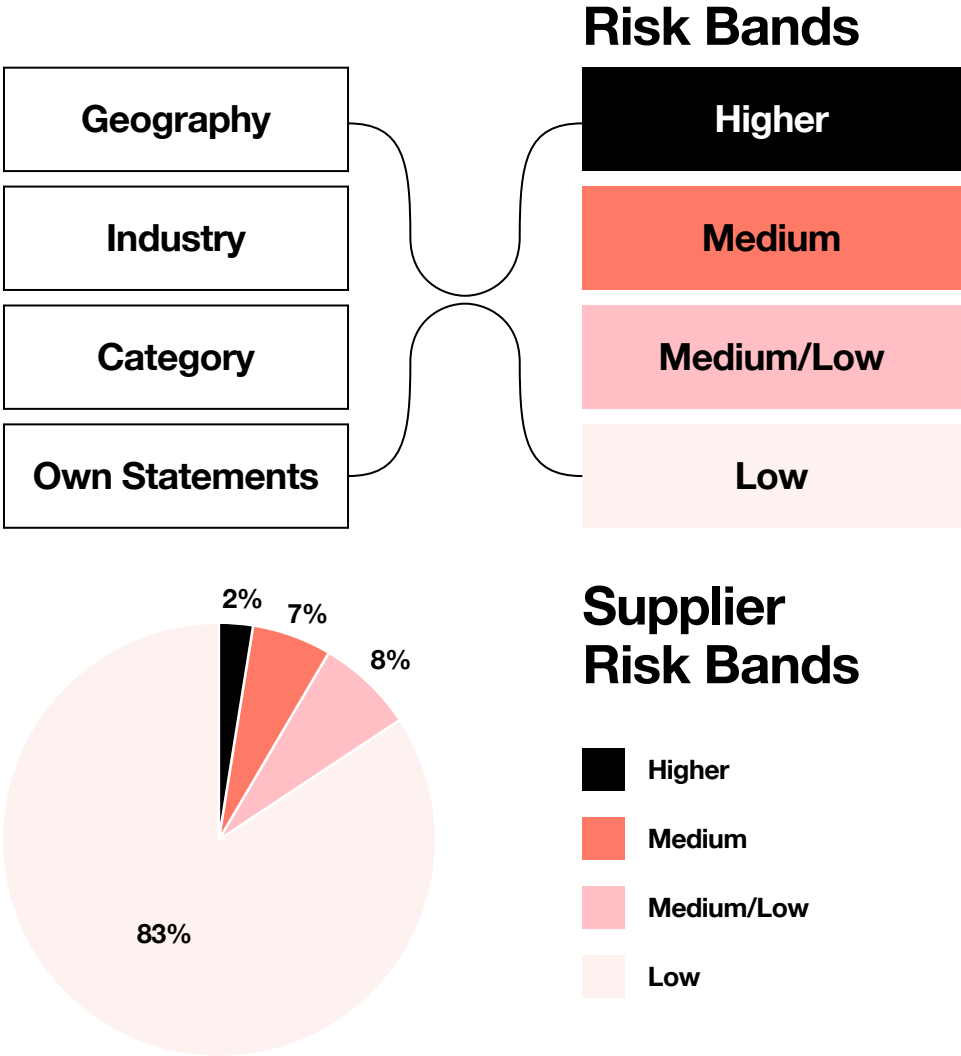


Three transacts with around 750 tier 1 suppliers, providing a wide range of equipment and services. Based on the criteria outlined above and our assessment of risks, we produced an evaluation of the likely inherent risks that each of these suppliers may have had in relation to modern slavery – either directly or via their supply chain.

**All suppliers are divided into 4 risk bands:**

Suppliers are categorised based on analysis of where they and their supply chains operate, the industry area and products we purchased, along with an assessment of their modern slavery statements.

- **Higher** – includes suppliers with links to high risk countries and high-risk industries due to the nature of the goods/ services.
- **Medium** – includes suppliers with medium risk supply chains and volumes of spend.
- **Medium/Low** – includes suppliers providing goods or services that may have a small element of their supply chain in areas with a moderate risk of modern slavery.
- **Low** – suppliers providing goods and services with no links to at risk categories or industries.



Those suppliers who are identified as having a higher potential risk associated with them were subject to a more focused review. In the period covered by this statement, we analysed the products and services provided by each supplier, identified the potential areas of risk and, by obtaining evidence from the suppliers and through wider research, confirmed that they had processes in place to address and mitigate these.

# Risk Management



We carry out a range of activities to better understand and manage our identified areas of risk.

- Having carefully considered where we may directly or indirectly contribute to potential risks of modern slavery, we conducted targeted reviews of the controls and processes that our higher risk Tier 1 suppliers have in place, to better understand the risks with their direct suppliers (our Tier 2). This includes reviewing the risks and mitigations they set out in their own modern slavery statements and gaining a better understanding of the main industries that their supply chains operate in and the associated levels of risk.
- We continue to embed our Supplier Code of Conduct with our supply base. Our Supplier Code of Conduct is automatically integrated into our standard terms and conditions and is built into our supplier onboarding process. All new suppliers are required to register on the system and respond to a series of questions that include confirming their commitment to complying with the Supplier Code of Conduct. New supplier registrations are reviewed and approved prior to them being made available for the business to place orders with. We are continuing to progress with a program to require our existing supply base to register and respond to the onboarding questions in the same manner.
- During the reporting period, we extended our EcoVadis and Dun & Bradstreet ESG assessment coverage on our existing supply base to cover 98% of our spend (91% in 2023). EcoVadis is a market-leading provider of business sustainability ratings that provides a multifaceted assessment and scoring of companies (and their processes and controls) across four key categories: environment; labour and human rights; ethics; and sustainable procurement. It combines this with news media to provide a score per category and an overall supplier score. This independent assessment data enables us to track issues and raise and monitor improvement actions related to modern slavery through the tool. Dun & Bradstreet provides ESG corporate data and analytics, further supporting our assessment of our supply chain partners sustainability rankings, including in respect of modern slavery.
- Where necessary, Three has developed an action plan for those suppliers who do not meet our expected standards.
- During the course of 2024-2025, we have continued to use a market-leading third party contract management tool to manage risk in our supply chain. We have built automated workflows around supplier onboarding and monitoring, using intelligence within the tool and have also integrated third party data (such as EcoVadis and Dun & Bradstreet) to help control risk within our supply chain more effectively, including modern slavery risk. We continually review our onboarding assessment system and processes to ensure potential risks are identified early in the engagement process.
- For the development of our sustainability strategy, we carried out a local materiality assessment in the UK and the promotion and protection of human rights was identified as a material topic.
- In preparation for the Corporate Sustainability Responsibility Directive (CSRD), we carried out a gap analysis to identify any potential risk areas covering ESG topics, including workers in the value chain. Our Supplier Code of Conduct, which all suppliers must adhere to, addresses this risk.

# Risk Management



Industry Area

Purchasing Category

Skill Types in Supply Chain

Location of Tier 1 Provider

Location of Supply Chain

Risk Profile Validation

Suppliers Risk Controls and MSA Statement

Relationship Management

Embed Contract Obligations on Modern Slavery

Investigate with supplier to resolve issues



# Training

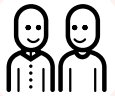
During the reporting period, we continued to deliver our training and awareness program and rolled out our new mandatory sustainability training module to all Three UK employees. The training includes a section on modern slavery to ensure the teams are aware of modern slavery risks.



To continue to incorporate the appropriate standard contractual clauses related to modern slavery;



Requiring potential new suppliers engaged in tender activities to confirm up-front that they will comply with our Supplier Code of Conduct;



That these teams work to ensure that our position is clearly communicated to our suppliers and that these suppliers clearly communicate to us how they themselves mitigate any potential risks of modern slavery; and



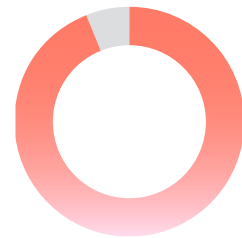
Where to find more information and training within our group concerning modern slavery risks and indicators and how to report any concerns through the dedicated channels or to management.



# Monitoring Effectiveness and KPIs



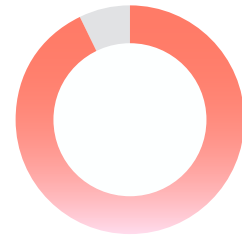
Three has focused on the following Key Performance Indicators (“KPIs”) to help measure the performance of anti-slavery measures undertaken. During the period of this Modern Slavery Statement:



• **95%**

of our **‘Higher’** risk band suppliers had modern slavery statements in place (95% in 2023)

- Suppliers representing 98% of our total spend (up from 60% in 2022 and 91% in 2023) have been assessed using EcoVadis and Dun & Bradstreet sustainability assessment services (target was 95%)



• **92%**

of our **‘Medium’** risk band suppliers had modern slavery statements in place (91% in 2023)

- There have been **zero** reports of modern slavery to our Whistleblowing service

Regardless of whether a supplier has a modern slavery statement in place, all our suppliers are required to comply with our Three UK Supplier Code of Conduct which is referenced in our standard terms and conditions and available on our website.

Furthermore, our supplier onboarding system enables a more comprehensive assessment of our supplier risk profile, including enhanced reporting and analysis of our supply base. For example, we are now able to report on which of our suppliers, across all risk tiers, have a modern slavery statement in place.

# 2025 Goals/Planned Activities in relation to Modern Slavery

In order to continually improve our approach to tackling modern slavery, there are a number of priority actions we have identified for implementation during 2025. These are to:

- Coordinate a fully aligned approach to governance, policies and initiatives, aimed at tackling Modern Slavery during the integration of Vodafone UK and Three post-merger
- Review of the Government's updated 2025 statutory guidance "Slavery and human trafficking in supply chains: guidance for businesses", considering and implementing (where appropriate) any changes to approach, policies or procedures
- Ensure that sustainability assessments continue to be performed on suppliers for at least 95% of our spend

This is Hutchison 3G UK Limited's ("Three") Modern Slavery and Human Trafficking Statement ("Modern Slavery Statement") for the financial year ended 31 March 2025, made to meet its obligations under section 54(1) of the Modern Slavery Act 2015. It also covers the operations of UK Broadband Limited, a wholly owned subsidiary of Three. Three has produced Modern Slavery Statements since the Modern Slavery Act 2015 entered into force as the turnover of Three has met and continues to meet the relevant turnover threshold. For this year, Three extended its financial end of year from 31st December to 31 March. For the period from 1 January 2024 to 31 December 2024, Three's turnover was over £2.5bn. This, our ninth statement, outlines the steps we have taken to identify, assess and mitigate the risks of modern slavery within our business and supply chain and provides details of our policies, approach and actions taken during 2024/2025 to further strengthen our commitment to uphold people's fundamental rights and freedoms.

