



Modern Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

All suppliers and subcontractors are required to complete the 2CL PQQ which includes providing their own Modern Slavery Policy, these are reviewed annually.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

RESPONSIBILITY FOR THE POLICY

The CEO has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

CORPORATE RESPONSIBILITY

We expect our suppliers to hold themselves and their own suppliers to the same high standards, meeting international laws and regulations. We will never knowingly deal with any organisation which is connected to slavery or human trafficking.

ORGANISATION OVERVIEW, STRUCTURE AND SUPPLY CHAIN

Operating across the UK, 2CL Communications Limited procures goods and services necessary for the design, delivery, installation, rental, and upkeep of voice and data communications technology. While our supply chain spans both UK and global partners, we remain vigilant regarding the elevated risks associated with outsourced manufacturing, labor-intensive industries, and high-risk geographical zones.

We evaluate our suppliers and subcontractors to ensure they can support our operations while actively identifying and mitigating potential risks via the internal PQQ. The Company only partners with suppliers who share our commitment to human rights and international labor standards.

2CL currently employs people only in the UK and one of the most important parts of our onboarding process is to ensure that each employee has the legal right to work here. These checks are carried out prior to issue of contracts.

STAFF COMPLIANCE WITH THE POLICY

All staff have read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. All are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Staff are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If staff believe or suspect a breach of this policy has occurred or that it may occur they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they will raise it with their manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain.

COMMUNICATION AND AWARENESS OF POLICY

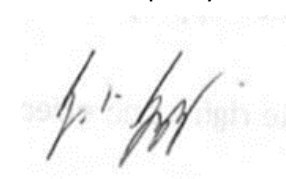
Training on this policy, and on the risk our business faces from modern slavery in its supply chain is carried out by all employees and reviewed annually.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Garrick Gregory CEO
9 February 2026