

MODERN SLAVERY AND HUMAN TRAFFICING STATEMENT

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**Anywhere Wi-Fi Limited (the “Company”)
Modern Slavery and Human Trafficking Statement**

INTRODUCTION FROM THE MANAGING DIRECTOR

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our employees are alert to the risks and are expected to report their concerns, and management are expected to act upon them.

ORGANISATION’S STRUCTURE

Anywhere Wi-Fi Limited, is an independent supplier of Mobile Broadband solutions. The head office is based near Grimsby, North East Lincolnshire and we operate across the Globe.

OUR BUSINESS

The principal activity of our business is the supplier of Internet Connectivity devices to Government Departments and Emergency Services.

OUR SUPPLY CHAINS

Our supply chains include the sourcing of Broadband devices predominantly from US based suppliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to working responsibly and ethically as set out in our Company Code of Conduct.

The Company has a number of policies which aim to minimise the risk of modern slavery in our supply chain.

These include:

Speak Up Policy – which encourages employees to report concerns, including any related to modern slavery/trafficking and child or forced labour.

Code of Conduct – the Company’s code makes clear to employees the actions and behaviour expected of them when representing the Company.

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The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Recruitment Policy – The Company uses only specified reputable employment agencies to source labour and always verifies the practice of any new agency it is using before accepting workers from that agency.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we;

- Build long-standing relationships with suppliers and make clear our expectations of business behaviour;
- Have a policy of “knowing our customer” to ensure that we are contracting with appropriate businesses;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

We expect each entity in the supply chain to, at least, adopt ‘one-up’ due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain. We have in place systems to encourage the reporting of concerns and the protection of whistleblowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide briefings to our Directors and employees.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains;

- Completion of audits by Company Managers, Director;

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- Use of staff monitoring and payroll systems; and
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

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 current financial year.

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