



Modern slavery statement for financial year 2020/21

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that DMSL has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. DMSL has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Established in 2012, Digital Mobile Spectrum Limited (DMSL) is a joint venture of the UK mobile network operators - EE, Telefónica (O2), Three and Vodafone.

DMSL specialise in transparently delivering complex programmes with multiple public and private stakeholders. Utilising our expertise in radio modelling, customer experience and TV coverage planning, we support our stakeholders in achieving their shared objectives through our TV interference mitigation, spectrum clearing and rural mobile coverage programmes.

Our core functions include good governance, programme management, IT, legal, supplier operations, procurement, quality audit, management information, relationship management, public affairs, marketing and communications. To ensure the confidentiality, integrity and availability of corporate information assets, we have implemented an information security management system and are ISO 27001 certified.

Our high-risk areas

DMSL does not manufacture the products it provides to its customers nor does it provide the services required in order to ensure the resolution of TV issues. We recognise that this is where a risk may lie with regards to modern slavery and human trafficking.

Our policies

DMSL follows a common set of business principles. These govern our day-to-day activities and apply to all employees. Our principles include collaboration, integrity, respect, commitment, leadership and empathy. We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Personal Conduct Policy along with our values explains the way we behave as an organisation and how we expect our employees to act.

5. Equal Opportunities and Anti-Harassment policies outline how seriously we take any form of discrimination and or bullying and victimisation.

Our suppliers

DMSL operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 11.1 The Supplier undertakes, warrants and represents that:
 - 11.1.1 neither the Supplier nor any of its officers, employees, agents or subcontractors has:
 - 11.1.1.A committed an offence under the Modern Slavery Act 2015 (a **MSA Offence**); or
 - 11.1.1.B been notified that it is subject to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015; or
 - 11.1.1.C is aware if any circumstances within its supply chain that could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015;
 - 11.1.2 it shall comply with the Modern Slavery Act 2015 and the Modern Slavery Policy; and
 - 11.1.3 it shall notify DMSL immediately in writing if it becomes aware or has reason to believe that it, or any of its officers, employees, agents or subcontractors have breached or potentially breached any of Supplier's obligations under Clause 23.1. Such notice to set out full details of the circumstances concerning the breach or potential breach of Supplier's obligations.
- 11.2 The Supplier shall during the Term and for the period of six (6) years thereafter maintain such records to enable DMSL to determine the Supplier's compliance with the Modern Slavery Policy.
- 11.3 The Supplier shall carry out an annual audit to monitor its compliance with the Modern Slavery Policy and provide a copy of the audit report. In addition, DMSL will review the audit findings as part of its usual supplier performance review meeting cycle. The Supplier shall, at its own cost, perform appropriate remediation actions to address any issues or failures identified by such audit within such timescales as are agreed with DMSL. The nature of the remediation action to be taken is at the discretion of the Supplier, but such action must address the relevant findings of the audit.
- 11.4 The Supplier shall prepare and deliver to DMSL on request an annual slavery and human trafficking report setting out the steps it has taken to ensure slavery and human trafficking is not taking place in any of its supply chains or in any part of its business.
- 11.5 Where the Supplier has the right to delegate or sub-contracts any of its duties or obligations under this Agreement it shall ensure that any sub-contract contains an obligation to comply with the Modern Slavery Act 2015 and the Modern Slavery Policy.

- 11.6 The Supplier shall conduct, and keep a record of, a programme of regular training for its officers, employees, agents, subcontractors and other members of its supply chain to ensure compliance with the Modern Slavery Policy.
- 11.7 The Supplier shall indemnify defend and hold harmless DMSL and its directors, officers and employees in full and on demand from and against any and all liabilities, claims, fines, demands, damages, losses or expenses (including legal and other professional adviser's fees and disbursements), interest and penalties incurred by them howsoever arising whether wholly or in part resulting from a breach of the Modern Slavery Policy.

Training

We offer relevant training (and development) to both our employees and contractors. This starts with their respective inductions and a checklist is used to ensure both communities understand what is expected of them.

Confidentiality

We operate a Dual Confidentiality Policy and any individual working with DMSL can be assured that any information they divulge to one of the leadership team will, if requested, be kept strictly confidential (subject to any legal requirements to disclose such information).

In addition, we have a Whistleblowing Policy in place which outlines what to do if any individual within DMSL is concerned – this policy encourages people to raise any concerns with their line manager. However, where an individual prefers not to raise it with their manager for any reason, they can contact our director of HR.

The policy sits within our employee and contractor handbooks and has the full contact details of the director of HR.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors in June 2018

A handwritten signature in black ink that reads "Ben Roome". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Ben Roome, director & chief executive officer

25 January 2021

New definition: Modern slavery policy means DMSL's anti-slavery and human trafficking policy as provided to the Supplier, which may be updated by DMSL from time to time.