

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

### **Our Business**

Viberoptix is a Tier 1 Contractor, operating in the telecommunications and constructions industries, building fibre networks throughout Northern Ireland and the wider UK. We specialise in the complete design and build of fibre networks, offering a full turn-key solution.

Viberoptix immediate parent is Fibrus Limited, a company registered in Northern Ireland.

The ultimate parent undertaking of the Company is Ox (Holdco) Limited, a company registered in England.

The ultimate controlling party of the Company is Infracapital Greenfield Partners II (Euro) SCSp and Infracapital Greenfield Partners II (Sterling) SCSp, both of which are registered in Luxembourg.

### **Our Commitment to the Principles of the Modern Slavery Act 2015**

Viberoptix is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff.

### **Our Supply Chains**

- Viberoptix supply chains are limited to Northern Ireland and the wider UK
- Viberoptix does not export goods to another country
- Supply chain entails purchasing of goods and services to deliver the design and build of the fibre network
- All suppliers are vetted prior to engagement

### **Policies and Controls**

Policies related to the Modern Slavery Act 2015:

- Anti-Slavery and Human Trafficking policy
- Anti-Bullying and Harassment policy
- Equal Opportunities policy
- Making a Protected Disclosure policy
- Recruitment and Selection policy

### **Due Diligence Processes**

Viberoptix has reviewed the supplier risks of slavery and human trafficking and have taken steps to identify such risks:

- Vetting suppliers prior to engagement
- Require suppliers to sign up to code of conduct, including payment of local minimum wage/living wage, working reasonable hours, having reasonable working conditions, conducting risk assessments, having procedures in place for dealing with any concerns of incidents of modern slavery or human trafficking

### **Risk Management and Assessment of Effectiveness**

To assess risk and effectiveness within the business:

- Review of policies and procedures
- Delivery and compliance of training
- Audits on recruitment, selection and pay, including right to work checks

To assess risk and effectiveness of suppliers:

- Request policies and procedures in place
- Annual audits and inspections
- Confirmation of adherence to right to work checks and meeting minimum wage requirements

### **Training and Compliance**

We will continue to embed the principles through:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- Ensuring staff involved in procurement activity comply with the Modern Slavery Act 2015 and ensure that suppliers are fully vetted before engagement
- Ensuring that consideration of the modern slavery risks and prevention are added to Viberoptix's policy review process as an employer and procurer of goods and services
- Ensure Viberoptix procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- Continuing to take action to embed a zero tolerance policy towards modern slavery
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

This statement has been approved by Naomhan McCrory, CEO, for the financial year ending 31 March 2024.

This statement will be reviewed and updated every year.