



Fibrus Group - 2026 Anti-slavery Statement

Introduction

This is Fibrus Group's second Anti-slavery Statement. Our first statement was published in May 2025.

Our commitment remains to manage our business operations responsibly and sustainably, and this includes fair treatment of all people in our operations and supply chains. We have a zero-tolerance approach to modern slavery of any kind within our operations and supply chains. We continue to take steps to ensure that our employees, contractors, and suppliers understand our commitment to human rights, and that they are similarly committed to the same standard. We expect that our suppliers hold their own suppliers to the same high standards.

This statement is made by Fibrus Ltd pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our anti-slavery and trafficking statement for the financial year ending 31 March 2026.

The statement outlines the approach of the whole of the Fibrus group.

Our business

Fibrus was founded in Northern Ireland in 2018 and is a broadband provider, delivering Fibre-To-The-Premises (FTTP) fibre optic broadband networks in the rural communities in the UK.

Our business operations are organized across the UK, as follows:

Fibrus Ltd (NI655901)	Group management sits with Fibrus Ltd, which also provides centralised shared services and support to the NI and GB operations, which are wholly owned by Fibrus Ltd.
Fibrus Networks Ltd (NI612703); and Fibrus Networks GB Ltd (13609662), collectively called Hyperfast Networks	Hyperfast Networks owns and operates the telecoms network in NI and GB, respectively.
Fibrus ISP (NI) Ltd (NI693046); and Fibrus ISP (GB) Ltd (14525121), collectively called Fibrus Broadband	Fibrus Broadband purchases wholesale networks access from Hyperfast Networks to provide full FTTP services to customers.
ViberOptix Opco Ltd (NI666759)	ViberOptix is responsible for building the network for Hyperfast Networks.

Our group employs around 620 staff. Fibrus is a trusted brand in the areas in which we operate, founded on providing a quality service at a fair price with supportive customer service.

We are building our fibre network in regional towns and hard to reach rural communities in Northern Ireland and England. For the current financial year, we will achieve FTTP availability to 492,000 premises across Northern Ireland and England and expect to have 175,000 customers.



Our supply chain

We are committed to end-to-end high standards and compliance in our business, from sourcing materials to providing FTTP services to our customers. Our Board of Directors has overall responsibility and supervision of our compliance systems and procedures, which is overseen by our Compliance Function.

Our supply partners play a crucial role in ensuring we deliver against these standards. Direct spend suppliers include those that supply infrastructure, fibre optic cable, poles, communications cabinets, ducts, network cards and routers. Indirect spend suppliers include those that supply goods and services such as logistics, fleet vehicles, utilities, IT and professional services.

Modern slavery - measuring effectiveness and training

All suppliers go through a formal onboarding pre-qualification process. This is managed by our Procurement Function.

We are a registered buyer with the UK government and completed the government's Modern Slavery Assessment Tool (**MSAT**) in July 2025. MSAT is the government's modern slavery identification and management tool. The MSAT provided recommendations on improvements to our anti-modern slavery processes. We continue to implement the recommendations and in November 2025 we introduced key performance indicators for our operations to measure the effectiveness of modern slavery compliance. These key performance indicators have been revised for the current financial year. We will also complete the MSAT again this year.

Our commitment to preventing modern slavery is set out in our Supplier Code of Conduct (**Code**), introduced in February 2026. The Code explains the core standards and policies under which we operate and it establishes the minimum standards and behaviours that must be met by our contractors and suppliers. The Code requires compliance with all the key elements of our rules, policies, procedures and guidelines notified to the suppliers, including the following policies: Anti-bribery & Corruption Policy, Conflicts of Interest Policy, Modern Slavery Policy, and our Whistleblowing Policy - each of which is incorporated into the Code.

The Code forms part of our supplier onboarding process for new suppliers. It has been notified to, and accepted by, all key suppliers (and any identified high risk suppliers) and will form part of our soon to be released updated purchasing terms & conditions. Our suppliers accept that they are expected to flow down the provisions of our Code within their operations and supply chains, through training. The Code, and the updated purchasing terms & conditions, will be rolled out generally to all remaining suppliers during this financial year.

All staff are required to annually complete our training on anti-bribery & corruption, conflicts of interest and modern slavery training as part of our compliance programme. Our key suppliers have also completed the same compliance training.

Our key suppliers are participating in our supply chain mapping project, initially through written responses to our written information request. The purpose of the information request is to help us with our due diligence to identify/assess the risk of modern slavery and human trafficking occurring in our supply chains, and any mitigation efforts we need to deploy to combat identified risks. We have



followed up with individual suppliers as needed. If anyone within our operations and supply chains fails to uphold any aspect of the Code, they are expected to implement corrective actions or risk having their employment or other contractual arrangement terminated.

Risk management

Modern slavery risks are evaluated as part of risk management, which is governed by our Risk Management Policy and the accompanying risk compliance programme. Risks are analysed, with any significant strategic, operational or regulatory risks or issues being recorded on the risk register and reviewed monthly at an operational and group board level.

Whistleblowing

We are committed to good practice and high standards and to being supportive to staff who raise genuine concerns under our Whistleblowing Policy, even if they turn out to be mistaken. Such concerns can be raised confidentially. Our suppliers, and their workers, can also raise concerns through our Whistleblowing Policy and reporting procedures. The Whistleblowing Policy is complemented by our grievance procedures, which staff can also use if a matter is not dealt with to their satisfaction.

This Statement was approved by the Board of Directors of Fibrus Ltd at a board meeting on 28 September 2026.

Signed by:

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Dominic Kearns
Group CEO