



## Modern Slavery Statement

### Global Statement of Intent

Lebara Group BV ("Lebara") corporate conduct is based on acting responsibly, honestly and with integrity. We have a zero tolerance stance towards slavery and human trafficking. We are committed to respecting, protecting and championing the human rights of all those who come into contact with our operations, including employees, supply chain workers, customers and local communities.

#### **Introduction:**

Modern slavery and human trafficking remain a hidden global blight and a growing issue given the rapid rise in global migration, existing in every region in the world and in every type of economy, whether industrialised, developing or in transition. No sector or industry can be considered immune or untainted.

It is the policy of Lebara and its affiliates to maintain the highest level of ethical standards in the conduct of its officers, directors and employees, to comply with all applicable anti-slavery laws in the countries where Lebara operates. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and business partners.

#### **Scope:**

The prevention, detection and reporting of slavery and human trafficking is the responsibility of all those working for Lebara or under Lebara's control. This policy applies to all individuals including but not limited to senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), contractors, consultants, casual workers, agency staff, agents or any other person associated with Lebara, or any of Lebara's subsidiaries or their employees, wherever located.

It is the responsibility of each and every Lebara employee to ensure that they have read and understood this policy, and to be compliant with its terms at all times. If you are unsure about any aspect of this policy or you have any questions, you should consult your line manager, or the Chief Legal Officer.

#### **Read in conjunction with:**

This policy is to be read in conjunction with Lebara's Values, Code of Conduct, and Whistleblowing Policies.

#### **Slavery:**

Modern slavery can occur in various forms, including servitude, forced or 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. A person is considered to be in slavery if s/he is forced to work through coercion, or mental or physical threat; owned or controlled by an 'employer' through mental or physical abuse or the threat of abuse; dehumanised, treated as a commodity or bought and sold as 'property'; or physically constrained or have restrictions placed on their freedom of movement.

Lebara does not tolerate or condone abuse of human rights within any part of our business or supply chains. We require the same high standards from all of our employees and expect it of all with whom we have business dealings. The basic rights which we expect all workers to enjoy includes:

- Respect for workers' human rights and full compliance with all applicable laws.

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- The right to a reasonable wage;
- The right to a safe working environment;
- The right to an appropriate level of holiday and cover for period of sickness; and
- The freedom to voice their concerns either through Whistleblowing Policy or directly if they believe that they are not being fairly treated or have any other concerns.

## **Reporting:**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You must therefore take immediate steps if you:

1. Suspect a person acting on behalf of Lebara or one of our businesses is seeking to exploit another in a way which could amount to modern slavery or human trafficking;
2. You have received an approach from a person acting on behalf of Lebara who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed; and/or
3. You have information which leads to the rational conclusion that a person acting on behalf of Lebara or one of our suppliers or business partners is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Any employee who, lawfully and truthfully, seeks advice, raises a concern or reports misconduct is doing the right thing, even if that concern turns out to be mistaken. Lebara is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that an actual or potential offence has taken place or may take place in the future. Under no circumstances, no matter how you choose to report, as long as your report is made honestly and in good faith, will the reporting of a possible impropriety serve as a basis for retaliatory actions against any employee. Allegations of retaliation will be investigated and appropriate action taken. Reports of retaliation should be made to the Chief Financial Officer, unless it concerns the Chief Financial Officer, in which case it should be raised with the Chief Executive Officer. Please see the Whistle-Blowing Policy for further details.

## **Responsibilities:**

This policy has been adopted by the Lebara Group B.V.'s main board. The board attaches the utmost importance to this policy and will apply and enforce a strict zero tolerance approach to slavery and human trafficking; any breach of this policy will be considered as a serious matter by the Group and will result in disciplinary action for employees, including where appropriate summary dismissal, or cessation of business in the case of business partners.

Compliance with this policy will be subject to regular review and audit. The main board will review this policy at least once a year to ensure it remains appropriate, effective and proportionate regarding the Group's operations and the jurisdictions within which it operates.

The Commercial Director and Operational Lead of each country are responsible for establishing appropriate responsibilities, procedures, training and internal controls within their respective operations to ensure the consistent implementation of this policy and compliance with its requirements.

It is the responsibility of the management of each business division to ensure that all Lebara employees and all third parties acting on behalf of Lebara are made aware of this policy and that appropriate due diligence is undertaken in relation to the appointment of all such third parties and the monitoring of their activities.

As stated at the start of this policy, it is the responsibility of each Lebara employee to ensure that they have read and understood this policy, and to be compliant with the terms of this policy at all times, as well as by reporting any suspicions of slavery or human trafficking.

Policy Name: Modern Slavery  
Date: June 2019  
Version: 1.0  
Owner: Group Legal

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## ***Training:***

Lebara have committed for 2019 to either source or create bespoke training to be delivered companywide to every employee through our Learning Management System/webinar. This will provide awareness for employees of the legislation and obligations.

Monitoring of training completions will be undertaken by the HR team.

## ***Monitoring our procedures***

Lebara employees are also strongly encouraged to play an active role in the continuous monitoring and review of Lebara's Modern Slavery Statement by submitting comments on this policy and suggestions for how it may be improved, as well as any queries or concerns, to the Company Secretary.

Lebara will review our Modern Slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.