

Modern Slavery and Human Trafficking statement

1. Introduction

Modern slavery encompasses slavery, servitude, human trafficking and forced labour and is an unquestionable and indefensible violation of an individual's basic human rights. Lebara Group B.V. and its subsidiaries ("Lebara" "Lebara Group") have 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 prevent any form of modern slavery in our corporate activities, and to ensure, as far as we are able, that our supply chains are free from slavery and human trafficking.

2. Organisation Structure

The main activity of the Lebara Group is that of virtual mobile network operator. This statement covers the activities of the Lebara Group which is headquartered in the Netherlands and has over 570 employees in entities across the world.

3. Relevant Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. 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.
2. 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.
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. Code of conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

4. Supplier Chain Management

Majority of our procurement activities take place in England. Lebara does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour. Accordingly, contractors and suppliers used by the Lebara are therefore generally not likely to be susceptible to this risk. 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 other business partners. We are, however, mindful that others may not always uphold the same standards or to the same level as we do. Consequently, employees responsible for managing suppliers and others involved with Lebara are, themselves, in so far as possible, responsible for ensuring that our values are upheld. This is a work in progress and we are strengthening our controls and evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We also expect our suppliers to hold their own suppliers to the same high standards.

5. Recruitment and Selection

The Company uses only specified, reputable employment agencies to source labour. All entities in the Lebara Group ensure appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports

Basic rights which we expect all workers to enjoy, include:

- 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.

6. Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. Awareness training is also provided for all main board members and entity directors and any other employees in relevant and appropriate roles.

Board Approval

This statement has been approved by the Main Board of Lebara Group B.V. who will review and update it annually.

This statement is made pursuant of section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.