

ONNEC Group – Modern Slavery and Human Trafficking Statement

Year: 1 January – 31 December 2025

Approved by ONNEC Group CEO

1. Introduction

ONNEC Group is committed to conducting all business ethically, responsibly, and in full compliance with the UK Modern Slavery Act 2015. We have zero tolerance for modern slavery, forced labour, child labour, servitude, or human trafficking in any part of our operations or supply chain.

This statement outlines the actions we have taken, and continue to take, to prevent modern slavery across our global operations, including the UK, Ireland, Europe, the Middle East, Asia-Pacific, and the United States.

2. Our Business and Structure

ONNEC Group is a global technology and infrastructure integrator specialising in structured cabling, data-centre services, ICT installations, managed services, and technology solutions. We employ a diverse workforce across 20+ regions and operate through a mix of direct delivery and subcontractor-led activity.

Our supply chain includes:

- Cabling and technology manufacturers (UK, EU, Asia, Middle East)
- Specialist labour subcontractors and installation partners
- Tooling, equipment and logistics providers
- Professional services, consultants and IT service suppliers

We recognise that some categories, particularly overseas manufacturing and labour-only subcontracting, present elevated modern-slavery risk.

3. Our Policies and Governance Framework

ONNEC's stance on modern slavery is reinforced by a comprehensive governance framework, including:

- Modern Slavery & Human Rights Policy
- ESG Policy
- Supplier Code of Conduct
- Procurement Procedure
- Anti-Bribery and Corruption Policy

- Whistleblowing Policy
- Health & Safety and Workforce Welfare Standards
- Data Protection and Privacy Controls

The Head of Compliance & DPO holds responsibility for modern-slavery governance and escalation.

4. Risk Assessment and Due Diligence

We undertake structured, risk-based due diligence covering:

4.1 Supply Chain Risks

- Countries with weaker labour protections
- Manufacturing of cabling, components, and electrical goods
- Labour-only subcontractors in the UK and overseas
- High-volume, low-margin activities where exploitation risk is elevated

4.2 Subcontractor Risks

Subcontractors are vetted on:

- Labour standards compliance
- Worker welfare processes
- Recruitment practices
- Payroll transparency
- Right-to-work checks
- Accommodation standards (where relevant)

4.3 Internal Workforce Risks

We ensure:

- No fees-for-employment
- Lawful contracts
- No forced overtime
- Fair working hours
- Right-to-work verification across all regions

5. Supplier and Subcontractor Controls

Every supplier and subcontractor must:

- Adhere to ONNEC's Supplier Code of Conduct
- Accept contract clauses prohibiting modern slavery
- Undergo labour-compliance screening

- Provide evidence of workforce policies and controls
- Demonstrate ethical recruitment and fair employment practices

High-risk suppliers are subject to enhanced checks, audits, and corrective-action plans.

6. Training and Awareness

We provide:

- Mandatory annual modern-slavery training for all employees
- Enhanced training for procurement, HR, project managers, and H&S leads
- Toolbox talks and site briefings for subcontractors
- Awareness materials and escalation routes via the IMS and intranet

7. Whistleblowing and Reporting Concerns

ONNEC maintains a robust Whistleblowing policy, allowing employees, subcontractors, suppliers, and third parties to report concerns. All reports are investigated promptly and impartially, with no retaliation permitted.

8. Actions Taken This Year

This reporting year, ONNEC has:

- Strengthened supply chain due diligence, especially in high-risk categories
- Conducted audits of priority suppliers and subcontractors
- Updated ESG and Supplier Code of Conduct requirements
- Delivered training and workforce-welfare awareness
- Integrated modern-slavery indicators into regional audits
- Enhanced oversight of overseas supply chains and labour agencies

9. Future Commitments

Over the next year, ONNEC will:

- Expand supplier audit coverage across high-risk regions
- Strengthen traceability for critical materials (e.g. copper cabling)
- Further integrate modern-slavery controls into project mobilisation processes
- Improve subcontractor competence checks around labour welfare
- Enhance KPIs and Board reporting on modern-slavery risk
- Support clients' due-diligence requests and wider industry initiatives

10. Approval

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and has been approved by the Board of Directors.

Signed:

A handwritten signature in black ink, appearing to read "P. Huinck", with a horizontal line underneath.

Phillipe Huinck
Chief Executive Officer, ONNEC Group
Date: 25 Nov. 2025