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MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2025

Tesco Mobile Limited is a mobile virtual network operator ("MVNO") and a joint venture equally owned between **Tesco PLC ("Tesco") and Virgin Media O2 ("VMO2").** VMO2 provides the mobile infrastructure to Tesco Mobile Limited, and our principal activities are the provision of prepay and pay monthly airtime services to consumers under the Tesco Mobile brand within the UK market. Sale of the airtime services and related devices are via the Tesco retail network. Delivery of the airtime services are over Telefonica's mobile communications network.

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending **31 December 2025.** It details the steps we have taken during the financial year to ensure that neither slavery nor human trafficking is taking place in our supply chains or any part of our business and the action we intend to take in pursuit of our ongoing commitment to maintaining high ethical standards.

POLICIES

As a business, we do not manufacture the products we sell to the consumers, nor do we always procure the devices, network equipment or services directly from the suppliers. This is because we are a joint venture MVNO. Therefore, we often rely on both Tesco and Virgin Media O2 to procure goods and services on our behalf. We also rely on them to procure and employ employees for our offices and phone shops. Accordingly, this year we have continued to actively monitor and ensure that they have the appropriate policies in place for their employees and suppliers which proactively address issues relating to ethical considerations like labour, environmental impact, and social contribution throughout their own supply chains. In the case of Virgin Media O2, forced labour, in all its forms, is prohibited by their use of the 'Supplier-Code-of-Conduct-Policy.pdf', a supplier facing code of conduct that is integrated into their supplier agreements and policed by risk-based sustainability due diligence. Where suppliers operate in sectors of heightened modern slavery risk, they are subject to specific modern slavery risk management reviews. This and their collaboration with sector initiatives like the Joint Audit Cooperation (JAC) - a sector initiative of telecommunications operators that have joined forces to verify, evaluate and develop the implementation of sustainability standards (Supply Chain Sustainability Policy) - in common suppliers provides us with confidence that we can rely on their management of modern slavery.

Tesco sets out its policies in their Code of Business Conduct www.tescoplc.com), and works either directly with suppliers or partners to ensure that human rights (Tesco Group Human Rights Policy) are promoted with the aim of having a positive impact on people. Tesco Mobile Limited takes any allegations or breach of the policies very seriously and have a whistle blowing policy (which we review annually in order to ensure it is still fit for purpose). Our whistleblowing policy is designed to foster an open and honest culture within the organisation. It provides a secure and confidential way for employees to report any concerns through a number of different channels about wrongdoing, including breaches of the law, our Code of Business Conduct, or our Values. Our whistleblowing policy is accessible to all employees via the company intranet and is also displayed prominently around our local offices. By maintaining a robust whistleblowing policy, we aim to uphold the utmost integrity and accountability within Tesco Mobile Limited.

Where we source suppliers directly, we employ contractual standards to ensure that there is an adherence to the policies we have in place to address issues of ethical trading. We have also continued to ensure that our suppliers and any subcontractors that they may deploy, are compliant with both our policies and legislation. In addition, we ensure a right of audit for all our material supplier contracts.

DUE DILIGENCE PROCESSES

We have confidence in the due diligence processes that our parent companies employ to identify and mitigate the risk of any modern slavery or human trafficking taking place in any of their supply chains.

Tesco integrates the use of a due diligence platform to review suppliers specifically for issues related to modern slavery and bribery & corruption as part of their on-boarding process. It aims to reduce the risk of slavery in the supply chain, to address the issues which can lead to slavery and works with the community to recognise those vulnerable to modern slavery modern-slavery-statement-2024_25_v15.pdf

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Virgin Media O2 operates many forms of risk based due diligence to ensure that its policies and principles are carried forward their own supply chains including sustainability reviews, on site audits and specific modern slavery risk management reviews Modern Slavery Statement - Virgin Media & O2

Tesco Mobile have entered into contracts with a number of new suppliers over the last year and have extended contracts with incumbent suppliers. Throughout the contractual process contract owners ensure that they undertake their own due diligence and compliance checks as part of our supplier on-boarding process. Such due diligence includes quarterly business reviews, checks during the tender process, reviewed at each contractual renewal, physical site visits to any suppliers viewed as a potential risk, documentation of standards and agreements as part of our contracting process. Traditionally, for key suppliers physical site visits are conducted by Business Owners and/or Supplier Governance.

Tesco Mobile only procure from reputable vendors ensuring that these vendors have a proven track record of ethical business practices and compliance with legal standards. This includes a stringent evaluation of their efforts to combat modern slavery and human trafficking. We require our vendors to demonstrate adherence to the highest standards of labour rights, ensuring that all workers are treated fairly and with respect. Where we procure off-shore support services, we require our vendors to sign up to minimum wage and local employment law in those regions as part of our contracting standards and inform the vendors to comply with our Human Rights requirements for Group Procurement. We take particular notice in areas where human rights regulations might not be as rigorous as in the EU. We have identified our highest risk service being web/chat supported services and customer care services in India and South Africa (findings based on RFQ's prior to contracting and comparison of off shore and UK). Senior Tesco Mobile employees conduct regular site visits to ensure enforcement of human rights regulations are effective in order to combat potential violations or modern slavery within our supply chain. The most recent of these visits were undertaken in April 2025 (FIS Global Delhi, India) and in March and November 2025 (Capita Cape Town, South Africa). Our visits are conducted annually and include small group meetings with no third-party involvement to discuss any concerns. Tesco Mobile acknowledges the UK Government's 2024 focus on strengthening the UK's response to modern slavery and improving supply chain transparency. Looking ahead to 2026, we will strengthen our current processes by introducing risk-based monitoring, enhanced employee training, and clearer reporting and escalation procedures. No incidents of modern slavery were identified or reported in 2025.

TRAINING

Tesco Mobile employees are provided with mandatory online training modules to ensure they fully understand Tesco Mobile's policies and processes. The modules, include Tesco Mobile's Code of Business Conduct which sets out various areas including Modern Slavery, explaining why it matters, how to recognise the signs and report any concerns.

For 2025, we had a compliance rate of 100% for mandatory computer-based training modules undertaken by 533 Tesco Mobile employees. In 2025 we also updated our training with further information on FCA consumer duty as part of our extended regulatory training.

FURTHER STEPS

We appreciate that risks of modern slavery are constantly changing. As a result, we are continually reviewing and improving our processes and procedures to ensure we are doing all we can as an organisation to prevent any modern slavery or human trafficking taking place in our supply chains. We will continue to provide modern slavery training to our supply chain in order to ensure our understanding of managing the risk of modern-day slavery is up to date. We will continue to work with our employees and suppliers to safeguard the highest ethical standards that we are committed to operate by.

The board of directors of Tesco Mobile Limited approved the Modern Slavery Statement and it is signed by the Chief Executive Officer on their behalf.

Jonathan Taylor

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[Authorised Signatory]
Tesco Mobile Limited

Date 29-Jun-26

TESCO