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MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2023

Tesco Mobile Limited is a mobile virtual network operator ("MVNO") and a joint venture between **Tesco PLC ("Tesco") and Virgin Media O2.** 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 2023.** 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 operated 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 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 are promoted with the aim of having a positive impact on people. We take any allegations or breach of the policies very seriously and have a whistle blowing policy (which we have reviewed this year in order to ensure it is still fit for purpose) in place which encourages our employees to freely raise concerns.

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.

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.

We 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

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undertake their own due diligence and compliance checks as part of our supplier on-boarding process. Such due diligence includes: checks during the tender process, physical site visits to any suppliers viewed as a potential risk, and 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. 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. 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 March 2024 (FIS Global Delhi, India) and in October 2024 (Capita Cape Town, South Africa).

TRAINING

Following a comprehensive review and update of our computer-based training approach, from February 2020, Tesco Mobile employees were no longer required to undertake Tesco or Telefonica online training but have instead completed bespoke Tesco Mobile mandatory online training modules to ensure they understand how Tesco Mobile's policies and processes fit into combatting modern slavery. The new updated modules, where appropriate, incorporated various areas to educate employees on the values of our parent companies and their zero tolerance approaches to unethical trading.

For 2023, we had a compliance rate of 100% for mandatory computer-based training modules undertaken by Tesco Mobile employees. For 2024, we have been working very closely with our employees to understand how these modules could be further improved in relation to content, delivery and accessibility. We aim to deliver these in early 2025.

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.

Jonathan Taylor

Tesco Mobile Limited