

Modern Slavery Act Transparency Statement

Tesco Mobile is a mobile virtual network operator and a joint venture between Tesco and Telefónica. Our principal activities are the provision of prepay and pay monthly airtime services to consumers under the Tesco Mobile brand. 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 2016. 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 rely on both Tesco and Telefónica to procure and employ staff for our offices and phone shops. We also rely on them to procure goods and services on our behalf. Accordingly, we 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 Telefonica, these policies are encapsulated in their Supply Chain Sustainability Policy ([Supply Chain Sustainability Policy](#)) and in the case of Tesco in their Code of Business Conduct (www.tescopl.com). We also have a whistle blowing policy in place which encourages our staff to freely raise concerns.

Where we source suppliers directly, we have revised our contractual standards to ensure there is an adherence to the policies we have in place from time to time to address issues of ethical trading. We also 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. Our procurement team has historically undertake their own due diligence and compliance checks as part of our supplier on-boarding process, these regularly include site visits to suppliers.

Going forward, the procurement process will also now incorporate the use of Tesco's due diligence platform as part of the procurement process. In 2017, a team of Tesco Mobile senior staff will be visiting the sites of our suppliers in India, our only non-UK based suppliers.

Training

All Tesco Mobile staff undertake mandatory online training, provided by either Tesco or Telefónica, in various areas to educate them on the values of our parent companies and their zero tolerance approaches to unethical trading.

Further Steps

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 work together with our staff and suppliers to safeguard the highest ethical standards that we are committed to operate by.

The board of directors of Tesco Mobile have approved this statement at its board meeting on 13th March 2017.



Roger Keenan
Chief Finance Officer
Tesco Mobile Limited

11/5/17
Date