



BAI COMMUNICATIONS LIMITED

Anti-Slavery and Human Trafficking Statement for Financial Year 2018-19

This Statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that BAI Communications Limited (the Company) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Statement from Group Chief Executive Officer, Jim Hassell

Modern slavery encompasses slavery, human trafficking, servitude and forced labour. The Company has 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 safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Structure

The Company is a wholly owned subsidiary in the BAI Communications Group of companies. BAI Communications is a global infrastructure owner and operator. We design, build and operate high quality, robust communications networks around the world for Wi-Fi and cellular communications and television and radio broadcasting.

The BAI Communications Group has an annual turnover in excess of £36m.

Our Supply Chains

The Company operates a preferred supplier policy. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance program. This will consist of:

- (i) Adhering to our procurement processes in respect of new and prospective suppliers to ensure that they are adequately vetted;
- (ii) Requiring all suppliers who have a turnover of £36m and above to provide a copy of their Statement published under the Modern Slavery Act 2015; and
- (iii) Issuing a copy of this Statement to all suppliers and asking them to sign to confirm their commitment to adhere to its terms and ethos.

In addition to the above, as part of our contracts with suppliers, we require that suppliers confirm to us that they have taken steps to eradicate modern slavery within their business and that they hold their own suppliers to account over modern slavery.

The Company has 3 principal areas where external suppliers are engaged to provide services:

- (i) Supply of Equipment – Low risk: sourced both in country and outside of country;
- (ii) Supply of Services – Low risk: sourced both in country and outside of country; and
- (iii) Supply of Consultancy Services – Low risk: sourced both in country and outside of country.

As highlighted under the section entitled, "Our Supply Chains", all suppliers are pre-qualified prior to appointment and submission of Purchase Orders.

Our Policies

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

- (i) 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;
- (ii) 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 reprisal; and
- (iii) Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Training

We ensure our procurement/buying teams understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Performance Indicators

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- (i) Completion of internal audits by our Risk and Compliance Team;
- (ii) Use of employee monitoring and payroll systems; and
- (iii) Communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

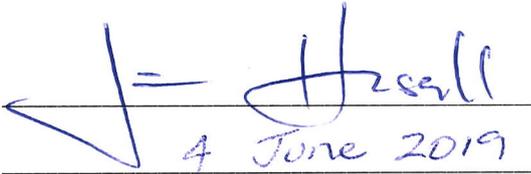
We will take such further steps as we feel may be reasonably necessary and appropriate to combat the risk of slavery and human trafficking faced by our business.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's anti-slavery and human trafficking statement for the current financial year.

Approval for this Statement

This Statement was approved by the Board of Directors on 3 June 2019.

Name (Director) James Hassell

Signature 

Date 4 June 2019