

Modern Slavery Act 2015: China Unicom (Europe) Operations Limited slavery and human trafficking statement

Introduction

Modern slavery is a crime and gross violation of fundamental human rights. It continues to be a priority for China Unicom (Europe) Operations Limited (“the Company” or “We”) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement sets out the Company’s actions to understand all modern slavery risks related to the business and to ensure steps are maintained to prevent slavery and human trafficking. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our company’s slavery statement for the financial year ending 31st December 2022.

Organisation's structure

We are a provider of telecommunication and information technology consultancy services in the telecommunication sector. We have over 119 employees worldwide and operates in seven countries. Our parent company is China Unicom Global Limited. China Unicom Global Limited has its head office in Hong Kong, China.

Our business

Our business is organised into two business units: Wholesale Business and Enterprise Business. The key offering from the Company in the wholesale market is ‘connectivity’. The target customers are mainly major telecommunication carriers. The Company provides transmission lines to these carriers for their own network backbone “connectivity” and also for their customers, meaning they can link up offices/locations. Our Enterprise business customers are a mix of companies across a range of countries and business types. Services offered here include ICT, leased lines, and cloud services.

Our supply chains

Our supply chain is a network between the Company and its suppliers to produce and distribute a specific product or service to meet the requirements of Company's operation and self-development. We procure products such as telecommunications equipment, materials, tools, general software, and services such as feasibility research, design, logistics, warehousing, application software development. The entities in the supply chain include producers, vendors, warehouses, transportation companies, distribution centres, and retailers.

As and when we have new contractors or supplies come on-board, we pre-qualify any new firm through a series of diligence, relating to company performance, HS&E compliance and references from other customers to establish they are suitable.

Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to minimise the risks of modern slavery and human trafficking infiltrating our business operations or supply chains.

We also make sure our suppliers are aware of our policies and ask that they adhere to the same high standards.

Due diligence processes for slavery and human trafficking

We understand that the following areas give rise to the highest modern slavery risks:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

As part of our initiative to identify and mitigate risk we aim to follow the due diligence process:

- Assessing risks in the provision of particular services
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We also have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Directors are responsible for compliance in their respective Business Units and for their supplier relationships.

Training

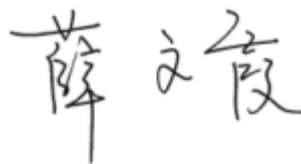
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff to ensure that they understand the risks of modern slavery infiltrating our business or supply chains and effective operation of our policies and procedures are aimed at mitigating this risk.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- We have in place a Whistleblowing Policy for the protection of those who whistleblow in relation to modern slavery.
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2022. It was approved by the board on 29th June 2023.

Handwritten signature in Chinese characters, reading '薛文毅' (Man Ha Sit).

DIRECTOR: Man Ha Sit

China Unicom (Europe) Operations Limited

Date: 29th June 2023