

## EE LIMITED

### MODERN SLAVERY ACT STATEMENT 2016/17

At EE we are committed to running our business responsibly. We strive to maintain high ethical principles and to respect human rights. It also means doing our best to encourage high standards in our supply chain and business.

Our business and supply chain – who we are and what we do

EE, part of BT Group, is the largest mobile network operator in the UK, delivering mobile and fixed communications services to consumers, businesses, government and wholesale markets. We also offer fixed broadband and TV.

We operate in the UK, have 12,500 employees and 570 high street shops with the majority of our employees helping our customers directly through our shops or contact centres. Across the BT Group, there are 30 million customer connections across the mobile, fixed and wholesale businesses. Since the end of 2016, all EE customer service calls have been handled in the UK and Ireland.

In February 2016, EE was acquired by the BT Group. We have been working hard to realise the benefits of bringing the two businesses together. On 1 April 2016 we changed how the former EE business was organised to manage it better within the BT Group. Business mobile was transferred to BT's Business and Public Sector line of business, the wholesale operations were transferred to BT's Wholesale and Ventures line of business, and the mobile network was transferred into BT's TSO line of business.

On 28<sup>th</sup> July 2017 BT announced the creation of a new Consumer business, bringing together EE and BT's Consumer businesses. The newly combined line of business, effective 1<sup>st</sup> September 2017, operates across three distinct brands, EE, BT and Plusnet – and spans fixed and mobile networks, consumer products and services and content.

#### Integration

When EE became part of the BT Group in February 2016 we were faced with the challenge to bring both companies together and ultimately to establish a common way of working where possible across the combined business. As with all organisations, both EE and BT had their own separate policies, governance and processes and our goal has been, and will continue to be over the coming months, of realising the benefits of bringing the two businesses together. We have an Integration Committee which oversees the integration of EE and BT. This includes integrating the cultures of the two organisations, improving customer experience, and monitoring progress towards financial synergy targets.

## Our stance on modern slavery - our policies and contracts

As a member of the BT Group, EE complies with, and is subject to, BT's code of ethics 'The Way We Work'. Whenever we purchase new products and services, the process is now managed through the combined BT and EE procurement team. EE's employees complete the same mandatory training as BT employees, which includes training on The Way We Work.

For this reason, our Modern Slavery Act Statement includes the statement by [BT plc http://www.btplc.com/Thegroup/Ourcompany/Ourvalues/ModernSlaveryAct/Modern-Slavery-Act-Statement-2017.pdf](http://www.btplc.com/Thegroup/Ourcompany/Ourvalues/ModernSlaveryAct/Modern-Slavery-Act-Statement-2017.pdf). This describes in a lot more detail the steps that are taken to ensure that slavery and human trafficking are prevented in our businesses and supply chains, including progress over 2016/17 and our plans for further improvements next year.

In this Statement, we explain where EE's practices and procedures differ to those described in BT plc's Modern Slavery Act Statement 2016/17.

## Our supply chain – our suppliers and procurement process

EE's purchasing process is now closely aligned with BT's group procurement policies. Our suppliers will still enter into contracts with us directly, which include the EE Supplier Ethical Charter <http://ee.co.uk/content/dam/ee-help/Help-PDFs/Supplier%20Ethical%20Charter%202015.pdf> as well as BT's code of ethics, The Way We Work.

**Procurement Governance Process** EE contracts go through EE's own contract approval process and BT's governance process, pending full integration into the BT procurement process.

**Due Diligence tools** - BT is now using the EcoVadis sustainability assessor tool as an additional validation measure which it was introduced to through its aligned working practices with the EE procurement team.

## Our business operations – overview of our people and recruitment

Following the acquisition of EE by BT plc, whilst most of our people stayed working for EE, some of our people transferred to BT under the Transfer of Undertakings and Protection of Employment Regulations. This meant that those employees' terms and conditions of employment with EE were transferred to BT.

We're not fully integrated yet, so some aspects of our business operations are different; we set out some of the differences below:

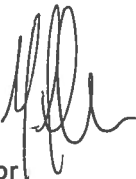
- **Employees** - our 9,000 people in the UK are made up of a mix of manager and professional roles, technical, customer facing and some specialist and support roles. The majority of employees work in customer facing roles, either in our contact centres or retail stores.
- **Recruitment** - we continue to recruit employees into the EE business, doing approximately 90 percent of our recruitment ourselves. We use the existing EE systems, processes and recruitment teams, whilst we continue to work towards creating one recruitment policy for both EE and BT. Our recruitment team use our standard recruitment processes, pre-employment checks and all recruitment is governed by the EE recruitment policy which all our recruitment teams are expected to follow.

- **Feedback** – we listen to what our people say, so that we can make changes when they're needed. In June 2016 our employee survey changed from Pulse to Your Say – BT's employee feedback system.

Speak up

We used Speak up before the acquisition, and continue to do so now we are part of the BT Group. Speak Up is a global, confidential helpdesk which lets anyone (including contractors and suppliers) report any wrongdoing or behaviour they think goes against our standards. It's available on the phone and online, and we promote it with poster campaigns, on our intranet, via internal communications and on the [Selling to BT website](#).

This Modern Slavery Act Statement covers the period from 1<sup>st</sup> April 2016 to 31<sup>st</sup> March 2017 and has been approved by the Board of EE Limited.

Signed   
Director

September 2017