

Modern Slavery Act Statement

Introduction from the Directors

We are committed to improving our practices to combat slavery and human trafficking. We have zero tolerance to slavery in any form, including, but by no means limited to, bonded labour, debt bondage, serfdom, forced labour, child slavery, marital slavery, sexual slavery and/or human trafficking. We expect all those in our supply chains to comply with our values and the Modern Slavery Act 2015.

Organisation's Business and Structure

We are a provider of cloud based contact centre and PCI DSS level 1 certified secure telephone payment solutions. We are part of the Ultra Communications group of companies, and our parent company is Ultra Communications Holdings plc (Company number: 08002694) whose registered offices are at Compass House, North Harbour Business Park, Portsmouth PO6 4PS.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery 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 ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we have contacted our key suppliers and assessed their compliance with the Modern Slavery Act 2015. We have in place systems to:

- Identify and assess potential risks 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 whistle blowers.

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 and require our business partners to provide similar training to their staff, providers and suppliers.

Supplier Adherence to our Values

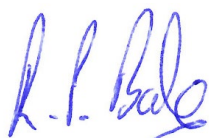
We have zero tolerance to slavery and human trafficking. We have in place a supply chain compliance program which consists of involvement from the following departments:

- Legal
- Audit and compliance
- Human resources
- Procurement
- Sales.

Our Effectiveness in Combating Slavery and Human Trafficking

Our internal audit and compliance officer and procurement director will conduct regular reviews and report to the Senior Management Team using key performance indicators.

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 2019.



Robert Bates
Chairman
Ultra Communications Ltd