

MODERN SLAVERY POLICY

POL-041 Issue 4, May 2024

1. POLICY STATEMENT

1.1 This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the "Act"). It sets out the steps taken by AST Networks to prevent modern slavery and human trafficking in its business and supply chain.

1.2 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.4 This policy applies to all persons working for us or on our behalf in any capacity, including

employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2. RESPONSIBILITY FOR THE POLICY

2.1 The senior management team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 Management at all levels have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

2.4 We confirm the identities of all new employees, temporary workers and contractors and their right to work in the United Kingdom.

3. COMPLIANCE WITH THE POLICY

3.1 All staff must comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Everyone is required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 If anyone believes or suspects that a conflict with this policy has occurred, or may occur in the

future, please contact our governance, risk and compliance team by e-mail at GRC@ast-networks.com

3.4 Our whistleblowing policy sets out our commitment to ensure people are free to raise anything they are concerned about. We encourage anyone to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If there is any uncertainty about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, staff are to raise it with their manager/supervisor and anyone else should contact one of the senior management team.

3.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the senior management team immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure. If you are not an employee you should contact our governance, risk and compliance team by e-mail at GRC@ast-networks.com.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular

training will be provided as necessary.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

4.3 We are committed to continuously improving our practices to combat modern slavery and human trafficking. This includes regularly reviewing and updating our policies, training, and risk assessment processes to address new challenges and incorporate best practices.

4.4 We will publish an annual modern slavery statement in accordance with the Modern Slavery Act 2015. This statement will be available on our website and will detail the steps we have taken to address modern slavery and human trafficking in our business and supply chains.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed:



Name: Dan Housego-Watts

Position: Head of Commercial Governance.

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Document Control

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