

## **Statement pursuant to the Modern Slavery Act 2015**

This Modern Slavery and Human Trafficking Statement is made by RETN Capital Ltd and its subsidiaries, ("RETN"), pursuant to section 54 of the Modern Slavery Act 2015.

### **1. Group structure and business**

RETN Capital Ltd is a private limited company registered in England and Wales with registered number 06967555. RETN is an international telecommunications services provider group with its primary markets in Europe, Russia, Kazakhstan, Belarus, Ukraine, Kyrgyzstan, Turkey, Singapore and China.

RETN AM LLC, a subsidiary company in Armenia is responsible for the marketing and sale of RETN's services in Armenia and other countries.

RETN BALKANS LTD, a subsidiary company in Bulgaria is responsible for the marketing and sale of RETN's services in Bulgaria and other countries.

FUE "RETN", a subsidiary company in Belarus is responsible for the marketing and sale of RETN's services in Belarus and other countries.

RETN GmbH, a subsidiary company in Switzerland is responsible for the marketing and sale of RETN's services in Switzerland and other countries.

RETN GmbH, a subsidiary company in Germany is responsible for the marketing and sale of RETN's services in Germany and other countries.

RETN Baltic AS, a subsidiary company in Estonia is responsible for the marketing and sale of RETN's services in Estonia and other countries.

RETN FINLAND OY, a subsidiary company in Finland is responsible for the marketing and sale of RETN's services in Finland and other countries.

RETN GE LLC, a subsidiary company in Georgia is responsible for the marketing and sale of RETN's services in Georgia and other countries.

RETN (Hong Kong) LTD, a subsidiary company in China is responsible for the marketing and sale of RETN's services in China and other countries.

RETN srl unipersonale, a subsidiary company in Italy is responsible for the marketing and sale of RETN's services in Italy and other countries.

RETN K.K., a subsidiary company in Japan is responsible for the marketing and sale of RETN's services in Japan and other countries.

RETN LLC, a subsidiary company in Kyrgyzstan is responsible for the marketing and sale of RETN's services in Kyrgyzstan and other countries.

TOO «RETN KZ», a subsidiary company in Kazakhstan is responsible for the marketing and sale of RETN's services in Kazakhstan and other countries.

SIA «RETN BALTIC», a subsidiary company in Latvia is responsible for the marketing and sale of RETN's services in Latvia and other countries.

"RETN Networks" S.R.L., a subsidiary company in Moldova is responsible for the marketing and sale of RETN's services in Moldova and other countries.

RETN BV, a subsidiary company in Netherlands is responsible for the marketing and sale of RETN's services in Netherlands and other countries.

RETN Sp. z o.o., a subsidiary company in Poland is responsible for the marketing and sale of RETN's services in Poland and other countries.

JSC "RetnNet", a subsidiary company in Russia is responsible for the marketing and sale of RETN's services in Russia and other countries.

RETN Nordic AB, a subsidiary company in Sweden is responsible for the marketing and sale of RETN's services in Sweden and other countries.

RETN PTE. LTD., a subsidiary company in Singapore is responsible for the marketing and sale of RETN's services in Singapore and other countries.

RETN Telekomünikasyon Hizmetleri Limited Sirketi, a subsidiary company in Turkey is responsible for the marketing and sale of RETN's services in Turkey and other countries.

RETN Telecoms Ltd., a subsidiary company in Taiwan is responsible for the marketing and sale of RETN's services in Taiwan and other countries.

RETN LLC, a subsidiary company in Ukraine is responsible for the marketing and sale of RETN's services in Ukraine and other countries.

RETN Ltd., a subsidiary company in England is responsible for the marketing and sale of RETN's services in Europe and other countries.

## **2. The Modern Slavery Act 2015 (the 'Act')**

The RETN group prides itself as one whose operations are conducted to the highest standards with personnel having a depth of both technical and commercial expertise. As part of its corporate governance standards, RETN seeks to ensure that its wider business practices also meet the highest standards and are seen to do so. The directors of RETN are committed to ensuring that the RETN group acts ethically and with integrity in all its business relationships.

In particular, RETN is aware that the risk of labour abuse through any form of slavery, servitude, forced or bonded labour (of adults or minors), or human trafficking (collectively referred to as 'modern slavery' in this Statement) is a very significant one for industries that operate on a global basis and it is therefore a key concern for RETN. Although, RETN believes that its group operates in a relatively low risk industry sector in regard to modern slavery, it is committed to taking the necessary steps to reduce the risk of modern slavery taking place at any level in its supply chain.

The Act obliges business to state the steps taken during the financial year to ensure that modern slavery is not taking place in their operations. RETN's supply chain includes mainly IT equipment manufacturers and their authorized distributors, telecom operators. In addition, RETN engages professional services as well as utilities, office-supply companies and professional advisers. These types of services are supplied to RETN group companies in various locations and, therefore, there are some suppliers who are based outside of Europe.

RETN has made and are continuing to make clear to its suppliers that it does not and will not tolerate modern slavery in any of its various forms. RETN endeavours to use only those suppliers who both agree within the applicable service supply terms to adhere to this same principle and who commit to ensure a safe and healthy working environment for their employees. Where RETN has concern in relation to the underlying supply chain, it requires its first-tier suppliers to take similarly active steps to identify whether any form of modern slavery may exist at the second or third tier levels and to audit for this at regular and reasonably frequent intervals.

## **3. Due diligence processes, training and reporting**

In support of our policy, RETN has established an action plan which includes:

- undertaking a review to identify potential risk areas in its supply chains taking into account factors such as the nature of the operations, situations and/or supplies that represent a particular risk, whether due to the location, industry sector or other characteristics of the business;
- consulting with its global business partners to ensure consistency of modern slavery policy and its practical implementation across our service supply;
- devising and putting in place appropriate training for our staff and especially those engaged in procurement activities and recruitment;
- developing and putting in place appropriate guidance, support and confidential facilities for the purpose of reporting concerns regarding the policy and its implementation, which is outside normal reporting lines and ensures that the information is received by those member(s) of senior management having oversight of modern slavery-related matters; and
- regularly assessing how effectively its policy is being implemented and what further steps may be necessary.

Signed: Anthony D. O’Sullivan, CEO RETN Capital Ltd.

Dated: 01 December 2021