



# Modern Slavery and Human Trafficking Statement



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Section 54, Modern Slavery Act 2015

## 1. Background and introduction

This statement is made by Delta 365 Ltd pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Delta 365 Ltd's modern slavery and human trafficking statement.

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, human trafficking and other forms of exploitation. Delta 365 Ltd is committed to acting ethically and with integrity in all business dealings and relationships, and to taking appropriate steps to ensure that modern slavery and human trafficking are not taking place in any part of our own business or supply chains.

We recognise that modern slavery risks can exist in any sector and that transparency, due diligence and ongoing improvement are important parts of responsible business practice. We take a zero-tolerance approach to modern slavery and expect the same standards from those who work with us or on our behalf.

## 2. Our organisational structure, business and supply chains

Delta 365 Ltd is a UK-based telecommunications and IT services provider. We deliver communications, connectivity, mobile, cloud, cyber security and managed IT solutions to business customers across the United Kingdom.

Our principal operations are based in the United Kingdom. Our supply chains are primarily connected to the telecommunications, technology and managed services sectors and include:

- telecommunications network providers, wholesale carriers and connectivity partners;
- mobile network operators and mobile service providers;
- hardware distributors, manufacturers and logistics providers;
- software, cloud, cyber security and SaaS providers;
- data centre, infrastructure and managed service partners; and
- professional service providers and other business support suppliers.

We have greater visibility over our direct suppliers than over lower-tier suppliers. We recognise that some technology supply chains, particularly those relating to hardware, electronic equipment and global manufacturing, may carry a higher inherent risk of labour exploitation because of the complexity and international nature of those supply chains.

## 3. Our policies and governance

Delta 365 Ltd maintains a policy framework and management approach intended to promote lawful, ethical and responsible business conduct. This includes our approach to recruitment, employment



practices, health and safety, procurement, supplier management, complaints handling and the reporting of concerns.

Our expectations are that employees, contractors, suppliers and business partners act ethically, comply with all applicable laws and do not engage in, facilitate or tolerate modern slavery or human trafficking in any form.

Concerns relating to modern slavery, human trafficking or unethical labour practices may be raised internally through management channels. Any concerns received will be reviewed seriously and escalated as appropriate. Where concerns involve a supplier, we will assess the circumstances and determine appropriate action, with a focus on addressing risks and supporting remediation where possible.

## **4. Risk assessment and management**

We assess modern slavery risk by considering the nature of the goods or services being procured, the sector involved, the geographical location of the supplier or relevant production activity, the level of visibility within the supply chain and any information available through supplier engagement, public sources or customer/supplier communications.

We currently consider the risk of modern slavery within our own direct UK operations to be low, given the nature and location of our workforce and business activities. However, we do not consider this to eliminate risk. We remain alert to the possibility of modern slavery and recognise that higher inherent risk may exist in parts of the wider global technology supply chain, particularly hardware manufacturing, electronic components, logistics and lower-tier suppliers.

Where risks or concerns are identified, we will consider appropriate steps, which may include further supplier engagement, enhanced due diligence, contractual requirements, corrective action plans, escalation to senior management, or reassessment of the supplier relationship where necessary.

## **5. Due diligence in relation to modern slavery**

Our due diligence processes are intended to help us understand and manage modern slavery risk in our business and supply chains. These processes are proportionate to our size, sector, supplier relationships and risk profile.

Current and developing due diligence measures include:

- considering modern slavery risk as part of supplier onboarding and supplier review activities;
- seeking to work with reputable providers that comply with applicable employment, human rights and anti-slavery legislation;
- requesting modern slavery statements, policy information or other compliance evidence from suppliers where appropriate;
- including appropriate contractual expectations or supplier obligations where relevant;
- reviewing supplier relationships where concerns are raised or identified; and
- escalating material concerns to senior management for consideration and action.

Our approach to supplier issues is intended to be proportionate and victim-centred. Where a concern is identified, our objective is to understand the risk, support effective remediation where possible and prevent further harm. Immediate termination of a supplier relationship will not always



be the most effective response if it risks driving the issue out of sight or causing further harm to affected workers.

## 6. Training and awareness

Delta 365 Ltd aims to ensure that relevant employees understand what modern slavery and human trafficking are, how risks may arise, and how concerns should be reported. Awareness is particularly important for colleagues involved in procurement, supplier management, recruitment, customer operations, service delivery and senior management decision-making.

We will continue to develop awareness activity and training proportionate to our business and risk profile. This may include providing guidance to relevant employees on indicators of modern slavery, supplier due diligence expectations, escalation routes and the importance of ethical sourcing.

## 7. Monitoring effectiveness

Delta 365 Ltd monitors and reviews the effectiveness of its approach through its supplier management, operational oversight and policy review processes. We recognise that measuring effectiveness is an important part of improving our response over time.

Measures we may use to monitor our approach include:

- the number and nature of any modern slavery concerns reported or identified;
- the proportion of relevant suppliers subject to due diligence or supplier review;
- the number of supplier reviews that include modern slavery considerations;
- completion of relevant employee awareness or training activity;
- review of supplier documentation, including modern slavery statements where appropriate; and
- progress against planned actions set out in this statement.

At the date of approval of this statement, Delta 365 Ltd is not aware of any confirmed instances of modern slavery or human trafficking within its own business operations or supply chains.

## 8. Next steps and continuous improvement

Delta 365 Ltd is committed to continuous improvement in its approach to preventing modern slavery and human trafficking. During the next reporting period, we intend to:

- review and strengthen supplier onboarding questions relating to modern slavery and ethical labour practices;
- identify suppliers or supplier categories that may require enhanced due diligence based on sector, geography or supply-chain complexity;
- develop a proportionate supplier assurance process for key or higher-risk suppliers;
- improve internal awareness for employees involved in procurement, supplier management and operational decision-making;
- review the need for a standalone Modern Slavery and Human Trafficking Policy or supplier code of conduct; and
- review this statement annually and update it to reflect progress and any material changes to our business or supply chains.



## 9. Approval

This statement has been approved by the Board of Directors of Delta 365 Ltd and is signed on its behalf by a director.

Signed: *Seamus O'Neill*  
Seamus O'Neill (Aug 4, 2026 13:02:45 GMT+1)

Name: Seamus O'Neill

Position: CEO

Date: 1<sup>st</sup> June 2026