

MODERN SLAVERY STATEMENT FOR XLN GROUP (“THE GROUP”)

FINANCIAL YEAR ENDING 31 MARCH 2019

INTRODUCTION

The Group takes a zero-tolerance approach towards slavery and human trafficking within its supply chain and expects the same commitment from its suppliers, contractors and business partners. This statement sets out the steps it has taken during the financial year to reflect this commitment.

ORGANISATIONAL STRUCTURE

The Group is a telecommunications, payment card processing and utilities services provider to UK small and medium sized business. We employ over 400 people based in two offices located in the UK.

This statement applies to and covers XLN Limited and all of its subsidiary undertakings (including XLN Telecom Limited, XLN Pay Limited and XLN Energy Limited).

OUR SUPPLY CHAINS

Our key supply chains comprise:

- Telecoms and energy wholesale suppliers;
- Payment card machine suppliers;
- Billing providers;
- Other IT and technical service companies

These businesses are large service sector organisations based in the UK. We have also appointed two small external organisations based in India to undertake telecoms sales activities. We consider that the sector that we operate in, the transactions that we undertake, and any business relationships that we enter into, all carry a low risk in terms of slavery and human trafficking.

In light of the above, the Group assesses that the overall risk from slavery and human trafficking within its business and supply chains is low.

OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING

The Group acts ethically and with integrity in all its business relationships. This is reflected by the standards set in our Employee Handbook. The Group is committed to ensuring that there is no slavery or human trafficking in its supply chains or in any part of our business.

DUE DILIGENCE

The Group will not support or deal with any business knowingly involved in slavery or human trafficking.

The Group will remain alert to any risk from slavery and human trafficking and carry out appropriate due diligence on its suppliers where necessary. We maintain a whistleblowing

policy for employees to report any unlawful activity, including instances of slavery and human trafficking. We regularly visit our Indian sales organisations and talk to the employees based there. If the Group has any reason to suspect that any of its suppliers are affected by slavery or human trafficking, it will carry out reasonable and proportionate investigations and take whatever action it considers appropriate. The Group will carry out appropriate checks on all prospective employees as part of its recruitment policy.

FURTHER STEPS

Our key performance indicators will be:

- The number of reports we receive of slavery or human trafficking within our business and supply chain; and
- The instances of our carrying out investigations and taking appropriate action.

We will review the risk from slavery and human trafficking annually and assess whether the risk has increased. If the risk has increased, we will consider what further proportionate actions are required to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. Such further actions may include introducing formal training about slavery and human trafficking across the Group's staff and additional due diligence of our supply chain.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 March 2019. It has been approved by XLN board of directors.



DIRECTOR

Date: 27.09.19