

Modern Slavery Act Statement

This statement is made by New Call Holdings Ltd as the ultimate parent company of the WaveCrest Group of Companies. At WaveCrest, we are committed to running our business responsibly. We strive to maintain the highest ethical principles and to respect human rights. Our Company handbook sets out the overall standards and commitments towards ethical conduct, anti-corruption and legal compliance. These standards extend to WaveCrest's suppliers, partners, agents, directors, employees and subcontractors.

Our organisation and our supply chain

WaveCrest is a global telecommunications services provider, with over 70 employees operating in 5 countries. WaveCrest currently procures, manages and sells voice products for a global market.

Our stance on modern slavery

We have a zero tolerance to slavery and human trafficking. We will not tolerate any such activities within our own operations or within our supply chain and are committed to taking appropriate steps to ensure that everyone who works for WaveCrest – in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected.

Risk Assessment

WaveCrest has undertaken external due diligence checks on a representative proportion of its suppliers, in order to ensure compliance with the Modern Slavery Act.

Monitoring, Compliance and Training

We aim to prevent modern slavery or human trafficking in our business right from the start of our on-boarding of new suppliers. Wherever possible, our contracts with suppliers contain the following clauses which require them to comply with applicable anti-slavery and related laws including the Act:

(a) In performing its obligations under the agreement, the supplier shall and shall procure that its suppliers and subcontractors comply with all applicable anti-slavery and human trafficking laws, statutes and regulations from time to time in force including but not limited to the Act.

(b) The supplier shall implement an appropriate system of due diligence, audit and training to ensure that there is no slavery or human trafficking in its supply chains.

We also, continuously review our standard commercial contract terms to impose obligations upon suppliers that they comply with the Act and take steps to ensure that their organisations are free from modern slavery;

In addition, we aim to ensure an ongoing high level of understanding amongst our workforce of the risks of modern slavery and human trafficking in our supply chains and our business. We are

committed to driving out acts of modern slavery and human trafficking from within our business and our supply chains. We currently have a number of employee policies in place to support this aim. These are hosted in our Company Handbook (which is available to all employees via the company intranet); some of which are also referenced in employee contracts (where applicable).

These policies include, but are not limited to:

- Bribery, corruption and fraud control
- Anti-Slavery and Human Trafficking
- Health and safety
- Whistle blowing
- Equal Opportunities
- Anti – Harassment
- Grievance and resolution

Our internal policies are reviewed in order to address modern slavery issues; and all employees and contractors undertake internal training to ensure the risks relating to modern slavery and human trafficking are understood and mitigated. All employees and contractors are provided with the details of our whistle blowing hotline to which they can make disclosures anonymously.

Evaluating our progress

Our related e-learning module is evaluated annually to reflect our commitment to the prevention of modern slavery and human trafficking. We will also annually analyse the various parts of our business, to re-assess risks and ensure our risk management is adequate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act and constitutes New Call Holdings Ltd and the WaveCrest Group's slavery and human trafficking statement for the financial year ending 31st March 2019, and has been approved by the Board of New Call Holdings Ltd



Dr Jerome Booth

Chairman