

Modern Slavery Statement for the financial year ended 31 March 2026

Introduction

This statement is made by Hutchison 3G UK Limited, trading as Three UK, pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by Three UK during the financial year ended 31 March 2026 to help prevent slavery and human trafficking in its business and supply chain.

This statement also covers the operations of UK Broadband Limited, a wholly owned subsidiary of Hutchison 3G UK Limited.

During the reporting period, Three UK became part of VodafoneThree. This transitional statement reflects the legacy Three UK policies, procurement processes and supplier controls that remained in operation for all or part of the financial year while integration progressed. Future statements will reflect the further alignment of arrangements and reporting across VodafoneThree.

Our business and supply chain

Three UK provides mobile telecommunications and data services to consumers, businesses and the wholesale market in the United Kingdom.

Its supply chain includes suppliers of network and telecommunications services, IT and hardware, handsets and devices, facilities services, marketing and professional services. Three UK recognises that modern slavery risks can arise in complex international supply chains, particularly in electronics manufacturing, outsourced services and other labour-intensive activities.

In addition to providing services directly to end users via our Three and SMARTY brands, we also provide wholesale services to several mobile virtual network operators.

To ensure mobile services can be provided globally, and our customers can access their services while abroad, we have roaming and interconnect relationships with numerous network partners across the world.

Three employs more than 3,000 people across our offices in Reading, Glasgow and approximately 185 retail stores.

Additionally, we have an indirect workforce of customer service agents, IT and network operations and support staff, through several strategic partners.

Governance and Policy:

Three is committed to preventing modern slavery and human trafficking in its operations and supply chain. Responsibility for managing modern slavery risks are shared across Procurement, Legal, Compliance and Sustainability teams, supported by a framework of policies, supplier controls and reporting mechanisms. During the reporting period, existing Three UK governance arrangements remained in place while integration activities commenced across VodafoneThree.

Policy / Document	DESCRIPTION
Human Rights policy	Our VodafoneThree Human Rights Policy is relevant for all employees and contractors of Three. It creates clear and consistent rules and guidance to prevent direct and indirect human rights risks materialising from VodafoneThree operations. The policy sets out our commitment to preventing modern slavery and human trafficking and prohibits any form of forced or compulsory labour in our business and operations.
Employee Code of Conduct	Our Employee Code of Conduct is relevant to all employees and sets out the minimum standards of conduct that we require from our people and serves as a foundation for our Company policies, processes and guidelines. In relation to Modern Slavery, it highlights our commitment to preventing modern slavery from occurring within our business and supply chain; provides links to our policy and statement; and reminds people that they have a duty to report if they have any suspicions of modern slavery taking place.
Supplier Code of Conduct	Our Supplier Code of Conduct sets out the standards which suppliers are required to meet when entering new contracts with Three. It is further embedded in our standard contract terms and suppliers are required to confirm compliance to the Supplier Code of Conduct as part of the onboarding process. Our Supplier Code of Conduct prohibits any form of slavery, servitude, forced or compulsory labour and/or human trafficking. To ensure that our suppliers are committed to complying with our Supplier Code of Conduct we request that they make any third parties providing services to them aware of our anti-slavery and human trafficking policies and procedures. Three's Supplier Code of Conduct was reviewed, and an updated version was published in June 2025. https://www.three.co.uk/content/dam/threedigital/terms-and-conditions/social-accountability/supplier-code-of-conduct-june-2025.pdf
Diversity and Inclusion Policy	This supports us in eliminating discrimination by promoting diversity, inclusion, and equality amongst our employees and eradicating unlawful and unfair discrimination in recruitment, training, working conditions, pay, promotion and any other aspect of employment.
Whistleblowing Policy	Our Whistleblowing Policy aims to encourage a culture of transparency which enables our people to raise concerns about how Three does business, challenge poor practices and behaviours and report business wrongdoing confidentially, including any instances of modern slavery and human trafficking.
Financial Crime Policy	The Financial Crime Policy makes it clear to our employees how to prevent, detect and respond to financial crimes including anti-bribery, anti-money laundering and economic sanctions. It also provides a route through which they can report any concerns.

Steps taken during the year

During the financial year, Three UK:

- maintained a Supplier Code of Conduct prohibiting slavery, servitude, forced or compulsory labour and human trafficking;
- included the Supplier Code of Conduct and relevant modern slavery requirements within supplier onboarding, sourcing and contracting processes;
- required new suppliers using Three UK's onboarding system to provide information about their approach to modern slavery and compliance with the Supplier Code of Conduct;
- continued to use independent ESG information to monitor sustainability and labour and human-rights risks within its existing supplier base;
- included modern slavery provisions in relevant supplier contracts; and
- provided risk-awareness training to the Procurement team covering ESG and modern slavery risks.

Where concerns may arise, employees can report them through the company's confidential reporting arrangements.

Monitoring Effectiveness & KPIs

Three has focused on the following Key Performance Indicators ("KPIs") for 2025 to help measure the performance of anti-slavery measures undertaken. During the period of this Modern Slavery Statement:

- Suppliers representing 99% of our total spend have been assessed using Dun & Bradstreet sustainability assessment services; and
- There have been **zero** reports of modern slavery to our Whistleblowing service

Mitigation and remediation

Where we identify that we have caused or contributed to modern slavery or related harm, we are committed to taking appropriate action to stop or mitigate the harm and support effective remedy for affected individuals. Where harm is directly linked to our operations through a supplier or business relationship, we will use our influence to encourage and support appropriate remediation, while seeking to protect affected people from retaliation and prevent recurrence.

Integration and future reporting

During the reporting period covered by this statement, Hutchison 3G UK Limited (Three UK) was a wholly owned subsidiary of VodafoneThree Holdings Limited (VodafoneThree), a joint venture owned 51% by Vodafone Group and 49% by CK Hutchison. While the businesses continued to operate under their existing governance and reporting arrangements during the reporting period, work has commenced to align governance, policies, processes and controls across the combined organisation.

Following the end of the reporting period, Vodafone Group acquired full ownership of VodafoneThree, creating an opportunity to further integrate governance, procurement and responsible business practices across the organisation. As the integration continues there will be closer alignment with Vodafone Group

policies and standards. Therefore, subject to the relevant legal and reporting requirements being satisfied, future modern slavery reporting is intended to be incorporated within Vodafone Group's reporting framework. The latest Vodafone Group Modern Slavery Statement can be found [here](#).

Approval

This statement was approved by the Board of Directors of Hutchison 3G UK Limited on 7th October 2026

Signed on behalf of the Board by:



Stephen Lerner

Counsel (Regulatory), Chief Regulatory & Gov't Affairs Officer & Company Secretary

Hutchison 3G UK Limited

This is Hutchison 3G UK Limited's ("Three") Modern Slavery and Human Trafficking Statement ("Modern Slavery Statement") for the financial year ended 31 March 2026, made to meet its obligations under section 54(1) of the Modern Slavery Act 2015. It also covers the operations of UK Broadband Limited, a wholly owned subsidiary of Three. Three has produced Modern Slavery Statements since the Modern Slavery Act 2015 entered into force as the turnover of Three has met and continues to meet the relevant turnover threshold. For the financial year ended 31 March 2026, Three's turnover was over £2.5bn. This, our eighth statement, outlines the steps we have taken to identify, assess and mitigate the risks of modern slavery within our business and supply chain and provides details of our policies, approach and actions taken during 2024 to further strengthen our commitment to uphold people's fundamental rights and freedoms.