



Hyperfast
Networks



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Fibrus Group

Anti-slavery policy

Modern Slavery Policy

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1 Policy Statement

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 All of these activities have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.3 Tackling modern slavery requires all of us to play a part. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

1.4 We expect the same high standards from all of our contractors, suppliers and other business partners. We expect that our suppliers will hold their own suppliers to the same high standards.

2 Responsibility for this policy

2.1 The board of directors of Fibrus Ltd has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 Our [Director of Regulation & Compliance](#) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to our [Director of Regulation & Compliance](#).

3 Identifying modern slavery

3.1 There is no typical victim and in practice it can be challenging to identify a potential victim of modern slavery. Some victims do not understand or recognise they have been exploited, or they are reluctant to come forward, or they tell their stories with obvious errors and/or omissions.

3.2 Some general indicators – victims may:

- 3.2.1 believe that they must work against their will;
- 3.2.2 show signs that their movements are being controlled;
- 3.2.3 show fear or anxiety;
- 3.2.4 have false identity or travel documents (or none at all);
- 3.2.5 be subjected to violence or threats of violence against themselves or against their family members and loved ones;
- 3.2.6 suffer injuries that appear to be the result of an assault or the application of control measures;
- 3.2.7 be threatened with being handed over to the authorities;
- 3.2.8 allow others to speak for them when addressed directly;
- 3.2.9 act as if they were instructed by someone else;
- 3.2.10 be disciplined through punishment;
- 3.2.11 work excessively long hours over long periods;
- 3.2.12 not have any days off;
- 3.2.13 have limited or no social interaction;
- 3.2.14 have limited contact with their families or with people outside of their immediate environment;
- 3.2.15 be unable to communicate freely with others;
- 3.2.16 be under the perception that they are bonded by debt; and/or
- 3.2.17 be in a situation of dependence.

3.3 This list is not exhaustive. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

3.4 If you have a suspicion, report it (see below).

4 Anti-slavery statement

4.1 We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our customers seriously.

4.2 The statement is approved by our board and it is published on our website.

5 Supply chains

- 5.1 We check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
- 5.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.
- 5.3 Our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.
- 5.4 We are taking steps to ensure we can account for each step of our supply processes - we know who is providing goods and services to us.

6 Reporting slavery

- 6.1 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you raise a concern under this policy in good faith, we will support you, even if you turn out to be mistaken.
- 6.2 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 6.3 If you think that someone is in immediate danger, dial 999.
- 6.4 Otherwise, you should discuss your concerns with to our [Director of Regulation & Compliance](#) who will decide a course of action, or report it in accordance with our [Whistleblowing Policy](#) as soon as possible. You can also call the uk modern slavery and exploitation confidential helpline on 0800 0121 700 or report it online at [File a report](#).

7 Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

8 Breaches of this policy

- 8.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 8.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.