

Voluntary slavery and human trafficking statement

Aqua Comms Designated Activity Company is a private limited company incorporated and headquartered in the Republic of Ireland. The Aqua Comms Group is one of the largest independent subsea fibre network operators with global services and a core network position in the North Atlantic. Aqua Comms (UK) Limited, Aqua Comms Management (UK) Limited and America Europe Connect (UK) Limited are wholly owned subsidiaries of Aqua Comms Group and are our main operating entities in the UK.

Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We include anti-slavery and human tracking provisions in all our contracts with suppliers. As part of Aqua Comms due diligence into modern slavery, Aqua Comms supplier approval process will include a review of the controls undertaken by our suppliers as part of the approval process.

We only employ agency workers through reputable employment agencies that adhere to our anti-slavery and human trafficking policy.

Aqua Comms will not support any business knowingly involved in modern slavery.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff.

This voluntary slavery and human trafficking statement is made in connection with Section 54 (1) of the Modern Slavery Act 2015, for the financial year ending 31 December 2020. It was approved by the board of directors of Aqua Comms on 14 September 2021.

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Christopher Nigel Bayliff – CEO and Director

14 September 2021