

GATEWAY GLOBAL COMMUNICATIONS LIMITED
(the “Company”)
Company No. 04229171

2021 Annual Statement in Compliance with S54 of the UK Modern Slavery

Period this statement covers: 1st January 2021 through to 31st December 2021

Implementation Update

Following on from our previous Annual Statement, the Company has taken the following measures during 2021:

Dividing our Vendors by Industry

We previously investigated the circumstances in which modern slavery might foreseeably appear in the supply chains of our UK companies, and took the position that vendors employing highly skilled personnel (such as engineers or other professionals) were low risk for instances of modern slavery, but that higher risk industry sectors for our business were:

- Providers of catering and cleaning services; and
- Product manufacturers.

These are the vendors we have focused on in terms of ensuring compliance with our policies.

This year we have updated our site access policies, and our suppliers have reviewed and confirmed acceptance of our policy statement. In particular, suppliers providing cleaning or catering services at Company facilities have confirmed that the identification documents for all personnel engaged in the provision of the services has been verified and returned to the respective individual.

New Vendors

The Company’s Vendor Management Group has required all new vendors to sign up to the supplier code of conduct which, amongst other things, requires each respective vendor to confirm that it has taken all reasonable steps to eliminate modern slavery and human trafficking in its supply chain.

We are currently in the process of finalising our modern slavery questionnaire which will be rolled out to all new vendors to complete prior to the provision of services to the Company.

Ongoing Staff Training

Previously, many line managers have been provided with training on the principles of the Modern Slavery Act 2015 on a one-off basis.

This year, all employees in the UK and all line managers managing UK employees have been required to go through the requirements of the Company’s modern slavery policy and confirm that they have read and understood the requirements of the legislation.

All employees in the UK and all line managers managing UK employees will be required to undertake a refresher training session on the Company’s modern slavery policy by 22nd March 2022.

Reporting

All Company personnel have been strongly encouraged to report any instances (or suspected instances) of modern slavery by email to grouplegal@pccwglobal.com.

Statement Registry

The Company's annual statement (including previous years) has been added to the statement registry.

Document Approval and Authorisation

Approved by: Frederick Ka Fai Chui

Date: 09/March/2022

Position: Director

