

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

2025 Annual Statement in Compliance with S54 of the UK Modern Slavery

Period this statement covers: 1st January 2025 through to 31st December 2025

Company Structure, Business and Supply Chains.

The Company operates as a provider of global communications and technology services. Our supply chain primarily comprises professional service providers, technology vendors, outsourced support functions, and suppliers of facilities and operational services. We recognise that certain categories of suppliers, particularly those involving lower-skilled, labour-intensive work such as cleaning, catering, and product manufacturing, may present a higher inherent risk of modern slavery, and we have structured our compliance activities accordingly.

The Company maintains a Modern Slavery Policy, Supplier Code of Conduct, and associated procedures which collectively prohibit all forms of modern slavery, forced labour, child labour, and human trafficking. These policies apply to all employees, contractors, and suppliers, and outline the standards and behaviours expected throughout our operations and supply chain.

Implementation Update

Following on from our previous Annual Statement, the Company has taken the following measures during 2025:

Dividing our Vendors by Industry

Having previously investigated the circumstances in which modern slavery might foreseeably appear in the supply chains of our UK companies, we 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 continued to focus on in terms of ensuring compliance with our policies.

The Company has continued to ensure that 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.

As of 2024, our modern slavery questionnaire had been completed and sent out to all new vendors prior to the provision of any services,

The Company conducts proportionate due diligence on all new suppliers and, where appropriate, existing suppliers. This includes requiring acceptance of our Supplier Code of Conduct, verifying the identity of personnel where services are provided on-site, and, for higher-risk suppliers, reviewing labour-related controls and policies. Our modern slavery due diligence questionnaire, currently being finalised, will form a mandatory part of pre-engagement checks for all new vendors.

Ongoing Staff Training

All employees in the UK and all line managers managing UK employees are required to go through the requirements of the Company's modern slavery policy at their annual appraisal and confirm in writing that they have read and understood the requirements of the legislation.

Reporting

All Company personnel are strongly encouraged to report any instances (or suspected instances) of modern slavery by email to grouplegal@pccwglobal.com. All reports are reviewed promptly and handled sensitively, with no tolerance for retaliation against individuals who raise concerns in good faith.

Future Commitments

During the next reporting period, the Company will focus on strengthening due diligence processes for higher-risk suppliers and continuing to review and refine our policies to align with evolving best practice and regulatory expectations.

Statement Registry

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

Document Approval and Authorisation

Approved by: Jonathan Webster

Position: Director

J. Webster

[J.Webster \(Feb 24, 2026 12:34:35 GMT\)](#)

Date: _____