

DigitalWell Modern Slavery Policy UK



Classification

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v.2	9 July 2026	Revising KPIs of suppliers	Jason White

Approvals

Approvers and dates are captured in the SharePoint meta data for this document.

Document Classification

DigitalWell has classified this document as stated in the header. We do not wish for any third party other than that specifically tasked with its evaluation to have access to any content.

This document may contain sensitive information, which if were to be obtained by a competitor could place Welltel t/a DigitalWell at a disadvantage.

We hope you look upon this statement favourably.

TABLE OF CONTENTS

Contents

1. Purpose 4

2. Scope 4

3. Modern Slavery 4

4. Our Business, Organisation Structure & Supply Chains 4

5. Assessing and Managing Risk 5

6. Responsibilities 5

7. Reporting 6

8. Employment procedures..... 6

9. Learning..... 7

10. Measuring Effectiveness..... 7

1. Purpose

- 1.1. The purpose of this policy is to ensure all employees, contractors and suppliers of Welltel UK Ltd. t/a DigitalWell conduct business in an honest and ethical manner and comply with all applicable legislation.
- 1.2. We believe that modern slavery has no place within our organisation. We therefore choose to follow the legislation and associated recommendations, in line with our organisation's ethical stance.
- 1.3. This policy is published in accordance with section 54 of the Modern Slavery Act 2015.

2. Scope

- 2.1. This policy applies to all persons working for, on our behalf of, or in any capacity for DigitalWell including employees at all levels, contractors, and suppliers in all jurisdictions.

3. Modern Slavery

- 3.1. Modern Slavery refers to a crime where people are exploited for criminal gain, it can take many different forms and by nature is often hard to detect. Modern Slavery encompasses labour exploitation, domestic servitude, sexual exploitation, and criminal exploitation.
- 3.2. DigitalWell strictly prohibits the use of modern slavery in our operations. We have and will continue to be committed to implementing measures aimed at ensuring that modern slavery is not taking place anywhere within our organisation.
- 3.3. DigitalWell is committed to acting professionally and with integrity in all its business dealings and relationships whether in Ireland, UK or abroad.

4. Our Business, Organisation Structure & Supply Chains

- 4.1. DigitalWell provides communications technology and managed services. Our expertise includes AI-powered voice solutions, cloud communications, contact centre platforms, and managed services designed to improve customer experience and operational efficiency.
- 4.2. Our organisation is structured across specialist teams including Engineering & Network Operations, Product & Platform, Sales & Marketing, and Corporate Functions such as Finance,

IT, and People & Culture. This structure supports strong governance, accountability, and oversight across all areas of the business.

4.3. While our sector presents a relatively low direct risk, we recognise that global technology and hardware supply chains can carry indirect risks.

4.4. Our supply chain is primarily technology and service based. It includes:

- Cloud, AI and communications providers
- Telecommunications and connectivity partners
- Hardware and network equipment suppliers
- IT contractors and professional services providers

5. Assessing and Managing Risk

5.1. We take a risk-based approach to identifying and addressing modern slavery risks, focusing on areas such as:

- Technology hardware sourcing
- Global supplier ecosystems
- Use of contractors and third-party services • Suppliers operating in higher-risk jurisdictions

5.2. To manage these risks, we:

- Conduct due diligence on key suppliers
- Prioritise established vendors with strong ethical standards
- Review supplier practices where appropriate

6. Responsibilities

6.1. All employee's, contractors and suppliers are responsible for committing to being a responsible business and to respecting human rights.

6.2. DigitalWell expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation.
- The prevention, detection and reporting of modern slavery in any part of our organisation is the responsibility of all those working for us or on our behalf.
- Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. Failure to comply with this policy may lead to disciplinary action up to and including dismissal.
- Employment and recruitment agencies and other third parties supplying employees to our organisation must confirm their compliance with our Code of Conduct and this policy.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that appropriate action is taken.

7. Reporting

- 7.1. All employees within the organisation have a statutory obligation to report knowledge or suspicion of modern slavery. Any genuine suspicion or knowledge of modern slavery is to be immediately reported to the People Team who will decide what further action is deemed necessary.
- 7.2. Employees who raise concerns of slavery in good faith may do so without fear of discrimination or reprisal.
- 7.3. These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with.

8. Employment procedures

- 8.1. DigitalWell has procedures in place pertaining to our employment practices. These include;
 - Robust recruitment processes in line with UK employment law under the Immigration Act 2014 / Immigration, Asylum and Nationality Act 2006, including “right to work” document checks, contracts of employment, and checks to ensure all employees are above minimum working age (16).

9. Learning

- 9.1. We want to help our employees to understand more about these issues and understand how to report any suspicions they may have related to modern slavery.
- 9.2. The topic of modern slavery, and our associated modern slavery policy, is communicated to new employees starting with DigitalWell.
- 9.3. We communicate any updates of this policy to all employees.
- 9.4. We continue to consider ways to further enhance awareness on the issues of modern slavery to all DigitalWell employees.

10. Measuring Effectiveness

- 10.1. We monitor our approach through the following KPIs:
 - Six tier one suppliers have been assessed against modern slavery criteria this year (up from zero last year)
 - Zero high-risk suppliers have been identified
 - 100% of our staff comply with our modern slavery & code of conduct policies
 - Zero concerns raised via internal reporting channels
 - Zero concerns escalated to authorities
- 10.2. Should a case of modern slavery be identified, DigitalWell will work with relevant authorities, support affected individuals, and take appropriate remedial action including termination of supplier or contractor relationships.
- 10.3. To date no incidents of modern slavery have been identified within our business