



1 INTRODUCTION

Cornerstone Telecommunications Infrastructure Limited ("CTIL") was founded in 2012 as a joint venture between Vodafone and Telefónica to manage the telecommunications network sites for both companies, including the consolidation of sites to create a single grid. CTIL provides the infrastructure that allows Vodafone and Telefónica to locate their antennas and associated cellular radio equipment and generate efficiencies in cell site deployment and the operation of the network infrastructure.

In accordance with s.54 of the Modern Slavery Act 2015, this statement sets out the steps CTIL has taken during the 2015-2016 financial year to try and ensure that slavery and human trafficking is not taking place in any of its supply chains and any part of its own business.

2 CTIL ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN

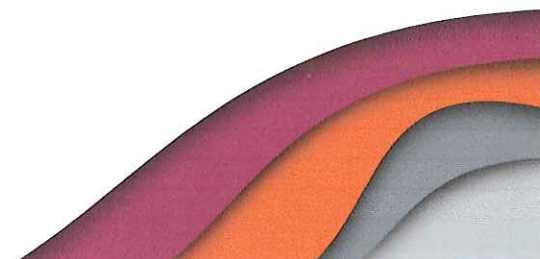
CTIL directly employs approximately 200 people throughout the UK, but we engage with a range of other service providers and equipment suppliers to deliver our projects. The supply chain for our core activities consists of established suppliers within the telecoms industry, providing services such as site acquisition, design, construction, and maintenance. We also work closely with providers of the following products and services:

- Real estate and town and country planning professional services;
- Legal services;
- Design and construction services for existing and new assets;
- Maintenance and repair services for our asset base; and
- IT software and managed services.

Our suppliers are almost exclusively UK-based, and we do not consider our industry and supply chain to be particularly susceptible to modern slavery and human trafficking. Our partners within our supply chain are predominantly providing low-volume, highly technical products and services where we consider the risk of modern slavery practices such as forced labour or exploitation to be low.

3 STANDARDS

To ensure a strong supply chain, CTIL has established baseline standards that must be met by our suppliers. Key to the success of CTIL is the development of strong partnerships with strategic suppliers, and that means we look for suppliers who are able to work within established service levels, provide quality deliverables and assist us in meeting and exceeding the expectations of our customers. We work closely with our suppliers to ensure they share CTIL's values and understand the importance of conducting business with honesty and integrity, and we expect all of our suppliers and business partners to conduct their business in a lawful and ethical manner. This includes adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place within their supply chains.





4 SUPPLY CHAIN MANAGEMENT AND DUE DILIGENCE

Whilst we do not currently carry out any modern slavery specific due diligence on our suppliers we do have a sourcing policy which provides guidance to our procurement teams on how they source products and services on behalf of CTIL, and the due diligence they must carry out on prospective partners and suppliers. Also, as part of our supplier selection process, suppliers are required to complete our on-boarding documentation, which includes a detailed pre-qualification questionnaire and assessments of the supplier's finances, insurance, capacity and capability. If, as part of this process, we were to identify a supplier or prospective supplier as being at risk of not achieving our standards (including in relation to compliance with the Modern Slavery Act 2015) then we would work with them to remedy any issues, but if we cannot find a resolution then we would not engage with that company.

Depending on their level of engagement and criticality to CTIL, our interaction with suppliers ranges from formal monthly supplier relationship management meetings to periodic reviews as required. Some suppliers will also receive unannounced site visits to check workforce accreditation and welfare facilities, for example, and these reviews and site visits would help us to identify whether any modern slavery practices are taking place within that supplier's business. If that were to be the case and the supplier was unable to resolve the problem, this would lead to us ending our relationship with them.

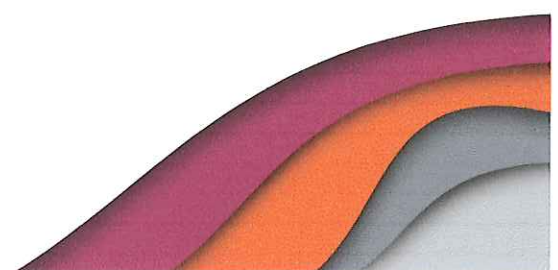
5 WHISTLEBLOWING

We operate a whistleblowing policy under which employees can report wrongdoing within the workplace. Employees should first report issues to their line manager and then to the HR director. We encourage employees to report any instances of unethical practices, which would include notifying the relevant person if they become aware of any modern slavery practices occurring within our business and/or supply chain.

6 FUTURE INITIATIVES

Whilst we have not implemented any specific procedures during our financial year which are focused on eradicating modern slavery and human trafficking from our supply chain or our business, we continue to assess and manage such risks on an ongoing basis. We are in the process of reviewing our procurement processes and internal standards, and over the following year will be considering a number of initiatives which, if introduced, we hope will continue to further minimise the risk of modern slavery and human trafficking within our business and supply chain, including the following:

- **Drafting contractual clauses** – we are looking at whether we can include specific clauses within our supplier contracts which address modern slavery in order to promote best practice within our supply chain, and to provide us with tangible remedies in the event that we identify any instances of malpractice;
- **Internal communications** – we will be issuing communications to all CTIL colleagues informing them of this statement and the nature of the Modern Slavery Act 2015. This will raise awareness of the issue and we hope will stimulate further innovation in relation to our approach as an organisation to combating modern slavery; and





- **Amending our sourcing policy** in light of the Modern Slavery Act 2015.

7 SIGN OFF

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes CTIL's modern slavery and human trafficking statement for the financial year commencing 1 April 2015 and ending 31 March 2016.

Signature:

A handwritten signature in black ink, appearing to read 'Malcolm Collins'.

Malcolm Collins

Managing Director

Cornerstone Telecommunications Infrastructure Limited

Date:

