## **MODERN SLAVERY STATEMENT 2024**

# HUTCHISON GLOBAL ENABLING SERVICES LIMITED (HGES)

#### Introduction

This modern slavery statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2024. This is the second time HGES has been required to produce a modern slavery statement.

This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our business and supply chain. We consider our business to be at low risk of modern slavery and human trafficking.

#### **Our structure**

HGES is a company within the CK Hutchison Holdings Limited ("**CKHH**") group of companies. CKHH is a multinational conglomerate headquartered in Hong Kong and listed on The Stock Exchange of Hong Kong Limited. CKHH has four core businesses: ports and related services, retail, infrastructure and telecommunications, and operates in about 50 countries / markets across the world with over 300,000 employees. CKHH is the ultimate parent company of HGES.

HGES is part of the telecommunications division of CKHH and is an indirect subsidiary of CK Hutchison Group Telecom Holdings Limited ("CKHGT") (the holding company of various telecommunications entities within the CKHH group of companies).

CKHH has zero-tolerance for modern slavery and is fully committed to preventing modern slavery and human trafficking in its group companies and their supply chains.

HGES employs the highest ethical and professional standards and seeks always to comply with all local laws and regulations applicable to our business. HGES is fully committed to preventing slavery and human trafficking in our corporate activities and our supply chains. We also expect the same high standards which we set for ourselves from those parties with whom we engage, such as our suppliers and customers.

#### Our business

The principal activity of HGES is to support the resale of telecoms services for other CKHH group companies using mobile virtual network enabling and Internet of Things platforms.

HGES does not have any employees. HGES' key stakeholders are its customers, suppliers and other subsidiary undertakings of CKHH.

#### Our supply chains

We have a limited number of third-party suppliers. Our material third party suppliers provide IT services and software for the running of our mobile virtual network enabling and Internet of Things platforms. HGES did not engage any new suppliers in 2024.

Of HGES' existing third-party suppliers, its most material contracts incorporate appropriate standard contractual clauses related to modern slavery.

Our procurement activities are carried out by employees of another CKHH group company, CKH IOD UK Limited (a registered company under the laws of England and Wales) ("**IOD UK**").

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A member of CK Hutchison Holdings

## Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

CKHH has group wide corporate governance policies (including modern slavery and human trafficking), with which HGES and IOD UK are required to comply. These policies include: the CKHH Modern Slavery and Human Trafficking Statement, CKHH Supplier Code of Conduct which sets the standards CKHH requires its business partners and suppliers to adhere to, CKHH Code of Conduct which sets the standard for all CKHH employees in promoting honest and ethical behaviour and compliance with all applicable laws, and the CKHH Human Rights Policy which sets out CKHH's expectations in respect of the protection and enjoyment of human rights.

During 2024, we developed a draft modern slavery policy for HGES and IOD UK to support our response to modern slavery. We are continuing to review this, including engaging with relevant stakeholders and making necessary changes in light of the Government's updated 2025 statutory guidance.

## Due diligence and risk assessment

Our supplier selection is handled by IOD UK and includes appropriate due diligence checks.

Most of our direct and material suppliers are based in the UK, US or continental Europe and/or are part of the CKHH group of companies. We do not consider that we source from high-risk industry or territories, with reference to the Walk Free Global Slavery Index which identifies those most at risk. Notwithstanding this, we remain vigilant to the risks and threats of modern slavery and human trafficking in all our business activities and relationships.

## Training

During 2024, we developed and delivered modern slavery training to relevant personnel who undertake procurement activities for HGES. This training will be regularly reviewed and repeated to build awareness of modern slavery risks and indicators.

## Looking forward

We will continue to assess our exposure to modern slavery and, alongside CKHH and CKHGT, evaluate the processes and systems we have in place to combat modern slavery in our operations and supply chains.

In particular, there are a number of priority actions we have identified for implementation during 2025. These include to:

- review the Government's updated 2025 statutory guidance "Slavery and human trafficking in supply chains: guidance for businesses" and consider and implement where appropriate any changes to our approach, policies or procedures; and
- finalise the draft modern slavery policy and release to relevant personnel (including providing training on the same) and implement appropriate controls to ensure modern slavery and human trafficking is not taking place in any of our supply chains or any part of our business.

This statement is approved by the Board of Directors and signed on its behalf by:

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David Ashley Director Hutchison Global Enabling Services Limited Date: 27 June 2025