

## MODERN SLAVERY STATEMENT 2025

### HUTCHISON GLOBAL ENABLING SERVICES LIMITED (*HGES or the Company*)

#### Introduction

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.

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2015 (the “Act”), and highlights activities we have undertaken during this financial year to understand and address modern slavery (as defined in the Act) and risks in our operations and supply chain.

#### Our structure

HGES is an indirect wholly-owned subsidiary of CK Hutchison Group Telecom Holdings Limited (“CKHGT”), which is part of the telecoms division of CK Hutchison Holdings Limited (“CKHH”). 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.

HGES does not have employees. The Company’s procurement activities are carried out by employees of another indirect wholly-owned subsidiary of CKHGT, CKH IOD UK Limited (a registered company under the laws of England and Wales) (“IOD UK”). IOD UK is the international development hub of CKHGT. IOD UK’s Director of Finance is responsible for management of HGES’ modern slavery risk.

#### Our business

The principal activity of HGES is the provision of a Mobile Virtual Network Enabler (“MVNE”) platform to other CKHGT group companies who use the platform to provide connectivity and other services to MVNOs in the UK and Europe. The Company also uses the platform to provide services direct to third party MVNOs who are providers of travel SIMs and/or IoT services to end users.

HGES’ key stakeholders are its customers (including both CKHGT group companies and third parties) and its suppliers.

#### Our supply chain

We have a limited number of third-party suppliers. Our material third party suppliers provide IT services and software for the running of our MVNE platform. HGES did not engage any new material suppliers in 2025.

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

We are committed to working to understand and address any risks of modern slavery in our supply chain.

#### Our policies

We are committed to ensuring that there is no 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 CKHGT (including 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.

### **Due diligence and risk assessment**

Given the nature of our business, we consider our supply chain and operations to be low risk in respect of modern slavery and human trafficking. We are not involved in manufacturing.

Our 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.

The Company's procurement policy and practices include appropriate due diligence checks on potential suppliers to safeguard against the procurement of goods and services from entities who do not meet the Company's high standards of ethical conduct and professionalism.

### **Training**

To ensure understanding of the risks of modern slavery in our supply chain and our business, the Company requires relevant personnel (including those engaged in procurement activities) to take training on modern slavery on a periodic basis. This training will be refreshed in 2026 to continue to build awareness of modern slavery risks and indicators.

### **Looking forward**

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

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



David Ashley - 19th June 2026  
Director  
Hutchison Global Enabling Services Limited