

## giffgaff Limited - Modern Slavery Act Transparency Statement

This statement covers our approach to minimising the risk of slavery and human trafficking in our operations and supply chain during the financial year ended 31 December 2018.

giffgaff Limited ("giffgaff"), is a wholly owned subsidiary of Telefonica UK Limited ("Telefonica UK"), which is a wholly owned subsidiary of Telefonica SA, a global telecommunications business headquartered in Spain with operations in Europe, North, Central and South America.

giffgaff is a UK based mobile virtual network operator, established in 2009 and runs on the O2 network. 'giffgaff' is an ancient Scottish word that means 'mutual giving' and, as such, we have 'members' rather than 'customers'.

Our core business is the provision of SIM only mobile services, predominantly in the online space and with no retail shops of our own, simplifying our distribution channel and supply chain.

We are the "mobile network run by you" - a member-run mobile communications network that utilises and rewards the collective resources of its members. Our business model, including the principle of mutuality, allows savings to be passed on to members and minimises our impact on the environment.

Whilst giffgaff operates as an entirely separate, distinct trading business and brand, and from its own premises in Uxbridge, London, the giffgaff team are directly employed by Telefonica UK and benefit from Telefonica UK policy and procedures on working policies and conditions, including Telefonica UK Business Principles.

These Business Principles prohibit any form of forced labour and therefore this, in addition to using Telefonica UK Procurement to source products in compliance with Telefonica's Supply Chain Sustainability Policy, means forced labour risks within giffgaff and how it conducts business or in its supply chain are minimal. Any possible forced labour risk will lie in the giffgaff supply chain where these risks are managed by the procurement policy and associated due diligence operated by Telefonica UK.

As a result, the Telefonica UK Modern Slavery Act Transparency Statement also applies to giffgaff and was approved on 16 April 2019 by the Board of giffgaff Limited.



On behalf of the Board  
Ashley Schofield,  
CEO, giffgaff