

giffgaff – Modern Slavery Act Statement 2019

This statement covers our approach to minimising the risk of slavery and human trafficking in our operations and supply chain during the financial year ending 31 December 2019.

giffgaff Limited (“**giffgaff**”), is a wholly owned subsidiary of Telefónica UK Limited (“**Telefónica UK**”), a network operator trading under the O2 brand. Both giffgaff and Telefónica UK are part of the wider Telefónica Group of companies. The ultimate parent company in the Group is Telefónica SA, a global telecommunications business headquartered in Spain with operations across the globe.

giffgaff is a UK based mobile virtual network operator, established in 2009. Our purpose is to harness the power of people, to challenge the established way and improve it.

Our core business is the provision of SIM only mobile services, predominantly in the online space, greatly simplifying our distribution channel and supply chain.

With no retail shops or call centres of our own, we work directly with our members to source ideas and feedback, provide frontline service support through our community pages and be a source of growth through giffgaff’s member led referral schemes. 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 a distinct trading business and brand from its own premises in Uxbridge, London, the giffgaff team are directly employed by Telefónica UK. Telefónica UK also procures goods and services on behalf of giffgaff and manages its supply chain. giffgaff operates in compliance with all relevant Telefónica policies including all HR policies, [Telefónica Business Principles](#) and [Supply Chain Sustainability Policy](#). As a result, giffgaff’s activities are addressed by the [Telefónica UK Modern Slavery Statement 2019](#), which addresses in full the UK Government guidance on such statements and was approved by the Board of giffgaff Limited.

Ash Schofield

On behalf of the Board Ashley
Schofield,
CEO, giffgaff