

# Wireless Logic Group

*Modern Slavery and Human  
Trafficking Statement*

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## Definitions

Wireless Logic considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or having restriction placed on freedom of movement

## Commitment

Wireless Logic acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions of the Modern Slavery Act 2015. This includes an ongoing review of both our internal practices in relation to our labour force and our global supply chains.

Wireless Logic does not knowingly enter into business with any organisation, either in the United Kingdom or abroad, which is involved in slavery, servitude or forced labour.

No labour provided to Wireless Logic in the provision of its own services is obtained by means of slavery or human trafficking. Wireless Logic strictly adheres to minimum standards required under employment legislation in all countries where it operates, including: United Kingdom, China, France, Germany, Spain, Nordics, Netherlands, Singapore, Italy, Austria, Israel, Australia, North America, Brazil and Malaysia.

We acknowledge that our Modern Slavery Statement for June 2025 has been published later than anticipated. The delay was due to:

- the need for additional internal review and approvals to ensure the statement accurately reflects our operations and commitments;
- the desire to enhance the quality and scope of the statement by incorporating more detailed supply chain data and engagement outcomes.

We remain fully committed to combating modern slavery and human trafficking in all forms, and to meeting our obligations under the Modern Slavery Act 2015. Steps have been taken to avoid such delays in the future.

## The Company

This statement applies to Wireless Logic Group Limited and refers to the financial year ending April 2026. Wireless Logic is owned and managed in conjunction with Montagu Private Equity. The Group employs over 750 people worldwide, operating in Europe, APAC and the US.

## What We Do

Wireless Logic is Europe's leading independent M2M and IoT managed services provider. We work with over 1,000 application providers, systems integrators, and enterprises, delivering services including management and monitoring platforms, a cloud-based private network infrastructure, and specialist mobile, satellite, fixed-line and low-power radio connectivity.

Our services operate across a unified technology platform tailored to connected assets across global M2M and IoT markets. We continue to invest in technology, offering added-value products such as Google and HERE mapping, device management platforms, encryption services, and managed hardware solutions.

Our verticals include asset tracking, telematics, metering, security, electronic payment, m-healthcare and various enterprise solutions. Our connected devices exceed 2.2 million SIM subscriptions across over 30 European mobile and satellite networks.

## Our Policies

We have the following policies in place to ensure there is no modern slavery or human trafficking within our business or supply chains:

- Group Whistleblowing Policy
- Group Code of Conduct and Business Ethics

These policies are regularly reviewed and updated as required.

## Governance and Structure

Board of Directors Leading the Business:

- Oliver Tucker, Group Chief Executive Officer/Founder
- Richard Miller, Group Chief Finance Officer

Departments:

- Group Management
- UK & Europe Sales and Administration
- Group Technology and Operations
- Group Network Design, Innovation and Product Development
- Group Finance and HR

Countries of Operation Include:

United Kingdom, China, France, Germany, Spain, Nordics, Netherlands, Singapore, Italy, Austria, Israel, Australia, North America, Brazil and Malaysia.

## Acquisition Due Diligence

Wireless Logic continues to acquire businesses in the UK and Europe as part of its growth strategy. The Board of Directors undertakes detailed due diligence prior to acquisition, including risk assessments related to modern slavery and labour rights. Where required, newly acquired entities are aligned to our policies and standards.

## Supply Chain and Due Diligence

To support its operations, Wireless Logic engages technology providers primarily in the UK, Germany, France and Spain. All suppliers are recorded in our in-house Sage system.

We conduct enhanced due diligence on key suppliers and new acquisitions. This includes:

- Risk-based assessments
- Supplier self-assessment questionnaires
- Contractual clauses requiring compliance with anti-slavery laws
- Follow-up action plans or audits where risk is identified

Wireless Logic recognises that some geographies—such as China—may present higher risks. As such, we apply enhanced scrutiny in these regions.

## Training and Awareness

Wireless Logic provides training to relevant staff—particularly those in procurement, HR and senior management—to raise awareness of modern slavery indicators and appropriate action to take when concerns arise.

## Monitoring and KPIs

We are developing KPIs to measure the effectiveness of our modern slavery programme, including:

- Number of risk assessments conducted
- Percentage of suppliers reviewed through due diligence
- Staff trained on modern slavery awareness
- Number of whistleblowing reports related to labour concerns

## Potential Exposure

Wireless Logic considers its exposure to modern slavery risk to be relatively low. Nonetheless, we remain vigilant and proactive in reviewing potential risks in our operations and supply chains. To our knowledge, we have not conducted business with any organisation found to be involved in modern slavery.

## Risk Identification and Management

We conduct regular assessments of risk, especially within regions and industries identified as high risk. We apply controls such as due diligence checks, policy alignment, and supplier monitoring to mitigate potential exposure.

## Actions Taken

In accordance with Section 54(4) of the Modern Slavery Act 2015, Wireless Logic has taken the following actions:

- Conducted risk assessments across the business and supply chain
- Embedded a zero-tolerance approach to modern slavery in company policies
- Integrated modern slavery clauses into supplier agreements
- Appointed a Slavery Compliance Officer

## Slavery Compliance Officer

Our CEO, Oliver Tucker, acts as the designated Slavery Compliance Officer. All concerns relating to potential modern slavery should be addressed to him, and appropriate action will be taken in accordance with our legal and ethical obligations.

## Review

This statement, made in pursuance of Section 54(1) of the Modern Slavery Act 2015, is reviewed annually and updated as needed. Further details can be found on our website page <https://www.wirelesslogic.com/anti-slavery-and-human-trafficking-statement/>

**Signed by:** Richard Miller, Group CFO

**Date of approval:** 15 July 2025