





Fibrus Group – Anti-slavery Statement

Introduction

Fibrus runs its businesses with honesty and integrity. We take malpractice very seriously and we have a zero-tolerance approach to malpractice anywhere in our business or supply chains. We expect all staff and suppliers to maintain high standards too. We similarly expect that our suppliers will hold their own suppliers to the same high standards.

We are committed to preventing acts of modern slavery and human trafficking from occurring within our businesses and supply chains.

This statement is made by Fibrus Ltd for itself and its group subsidiary companies, pursuant to Section 54(1) of the Modern Slavery Act 2015 and relates to its most recent financial year, ending 31 March 2025.

This statement covers the activities of the Fibrus group and it includes the plans for 2025 concerning modern slavey.

Our business

Fibrus was founded in Northern Ireland in 2018 with the goal of delivering full fibre broadband to underserved rural communities. We launched our first service in Northern Ireland in 2019 and have since rolled out broadband service across Northern Ireland and Cumbria, in the north of England.

Our business operations are organised as follows:

- 1. Group management sits with Fibrus Ltd, which also provides centralised shared services and support to the NI and GB operations, which are wholly owned by Fibrus Ltd.
- 2. Fibrus Networks Ltd and Fibrus Networks GB Ltd (collectively called Hyperfast Networks) own and operate the telecoms network in NI and GB, respectively.
- 3. Fibrus ISP (NI) Ltd and Fibrus ISP (GB) Ltd (collectively called Fibrus Broadband) purchase wholesale access from Hyperfast Networks and then provide full fibre broadband services direct to customers.
- 4. Viberoptix Opco Ltd is the primary build contractor, responsible for building the network for Hyperfast Networks.

Our group employs around 650 staff.







Hyperfast Networks builds its network in regional towns, and it has also successfully bid for, and delivered, government subsidised contracts to deliver services in more rural areas, which would not be commercially viable without government support.

This combined network of regional towns and rural premises means that Hyperfast Networks has the a far reaching rural network in Northern Ireland and it will have the same in Cumbria when its build programme is fully completed. To date, Hyperfast Networks has successfully provided connectivity to over 410,000 homes across Northern Ireland and Cumbria, many of which previously lacked any access to broadband.

Fibrus Broadband had 113,000 customers at 31 March 2025.

Fibrus is a trusted brand in the areas in which we operate, founded on providing a quality product at a fair price with great customer service.

Our supply chain

Fibrus group purchases a range of products and services from global supply chains. Purchasing is managed by a central procurement team, supported by a contract management team.

Suppliers are subject to an onboarding process, as part of which they must pass a pre-qualification exercise, which also requires suppliers to observe applicable UK laws.

We use only suppliers of good standing and key suppliers are supervised by one or more of our procurement specialists, our contract management team and also Viberoptix for build contractors. This provides greater visibility into our suppliers and their supply chains.

Compliance, risk and measuring effectiveness

Risks are inherent in our business and it is impossible to remove all risks. Our aim is, therefore, to identify the risks we face in order that we can manage them, one of which is modern slavery and human trafficking.

One measure of how we assess and manage risk is through our risk policy and the associated risk register which is reviewed monthly at a group level.

Fibrus has also implemented an anti-slavery policy, complemented by anti-bribery, gift & hospitality, conflicts and whistleblowing policies. Suppliers are made aware of our policies and are expected to adhere to the same high standards.

Our policies are underpinned by a compliance programme which is overseen by our Group Director of Regulation & Compliance.







We encourage open communications from all those who work for us and we want everyone to feel secure about raising concerns. Our whistleblowing policy applies to all employees, officers, consultants, contractors and to other workers in the Fibrus group. Our whistleblowing hotline also provides our workers with an opportunity to report unethical practices or malpractice anonymously and confidentially.

In 2025, as a further measure to ensuring transparency within our business and supply chains, we are including anti-slavery and trafficking clauses in our standard purchasing terms & conditions and supply contracts, which will also impose specific anti-slavery obligations on suppliers, in effect flowing down to suppliers obligations to contractually manage the risk of slavery occurring in their supply chains.

There will be a contractual requirement that suppliers carry out independent compliance audits, on request, to monitor their compliance with our anti-slavery policy and to provide a copy of the audit report to us. Higher risk suppliers will also be required to prepare and deliver to us an annual slavery and human trafficking report, including the steps they have taken to ensure slavery and human trafficking is not taking place in any of their supply chains or in any part of their business.

We also plan to complete a modern slavery assessment to assess our overall proficiency in managing and preventing the risks of modern slavery within our businesses and supply chains, and to develop an action plan for those areas for further improvements in our compliance programme to reduce the risk of modern slavery.

We will measure the effectiveness of our compliance programmes through the mandatory internal reporting, the planned enhanced supplier supervision and monitoring and our training programmes.

All of these steps will help to ensure we can account for each step of our supply processes.

Training

To ensure a high level of awareness in our businesses and supply chains, modern slavery training is being delivered to all staff, as part of our wider compliance training programme for other policies.

All staff will receive training on how to recognise the risks of modern slavery and human trafficking in our businesses and supply chains. Higher-risk suppliers will similarly receive guidance on our anti-slavery (and related) policies.

This Statement was approved by the Board of Directors of Fibrus Ltd at a board meeting on 6 May 2025.

Signed by:

Dominic Larns

Dominic Kearns

Dominic Kearns
Group CEO