

## **IDT Retail Europe Limited**

### **Guidance on statement on Modern Slavery and Human Trafficking**

**August 1, 2021 – for the financial year August 1, 2021 – July 31, 2022**

#### **1. Introduction**

IDT Retail Europe Limited (“IDT REL”) is a UK based company and a subsidiary of IDT Corp. (“IDT”). In this statement the term “Group” refers to IDT and all companies under its chain of ownership.

IDT REL takes its responsibilities as a world citizen seriously and is committed to conducting its business in a lawful and ethical manner. We promote a culture of acceptance, equality and respect for the individual. In particular, IDT REL has a zero tolerance of slavery and human trafficking and applauds efforts being made globally to eliminate such practices.

This Statement sets out the main steps IDT REL takes to tackle slavery and human trafficking. It is published in accordance with the reporting obligation in the UK's Modern Slavery Act 2015.

#### **2. Organisational structure, business and supply chains**

IDT is a global telecom carrier, terminating international long distance calls around the world for Tier 1 fixed line and mobile network operators, as well as other service providers.

IDT REL has approximately 3 employees, all of whom are based in the United Kingdom.

The telecommunications services provided by IDT REL are predominantly procured from its affiliates, and in turn procured from direct connections to Tier I telecom providers in North America, Latin America, Asia, Africa, Europe and the Middle East. Tier I providers are the largest recognized licensed carriers in a country.

Telecommunications services are also procured from mobile network operators, as well as a smaller number of small providers.

These vendors enter into carrier services agreements with affiliates of IDT REL. These agreements contain strict provisions that require the parties to comply with all applicable laws.

The systems used by IDT REL, its affiliates and these vendors are highly sophisticated automated software systems capable of processing very large amounts of data and transactions. Any human involvement is typically in account management, software configuration and finance.

As such, IDT REL's own business operations and supply chain consists primarily of office based professionals and skilled workers, with only very limited exposure to areas with a greater risk of modern slavery, for example, cleaning services, and travel and accommodation providers.

### **3. Internal Policies**

It is our belief that modern slavery and human trafficking are abhorrent practices that will not be tolerated in our own operations or in our supply chains, and we will take such steps that are reasonable to ensure that none is present. We are committed to working ethically and with integrity and we require our business partners to do the same.

IDT has an Anti-Slavery Policy which refers specifically to slavery and human trafficking, and systems have been put into place to make it easy for our employees to disclose any concerns they may have regarding such practices with the Group. Employees are also encouraged to report any concerns about slavery or human trafficking that they may suspect or may have witnessed outside of the Group, whether or not they have become aware of such during the performance of their employment.

These policies are made available to employees on our corporate intranet site and have been adopted by IDT's Board of Directors.

### **4. Due Diligence**

We have conducted an assessment of the risks, both external and internal, of slavery and human trafficking, including country risks, sector risks and business partnership risks within our own operations and our supply chain and we have determined that none of our own business operations are undertaken in higher risk areas, whether by reference to geographical location or business sector.

### **5. Future steps**

Throughout fiscal year 2022, IDT REL will continue to monitor the risk of slavery and human trafficking in its supply chains and its own business, and we will act and report accordingly.

This statement is made pursuant to s.54 (1) of the Modern Slavery Act 2015 and constitutes Slavery and Human Trafficking statement for the financial year through 31 July 2021. It has been approved and authorised by the Board of Directors of IDT REL.

SIGNED: NLFord

Dated: 03/08/2021