

## **MODERN SLAVERY ACT STATEMENT 2020**

At Cambium Networks, we are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. We will only engage suppliers and direct contractors who demonstrate a serious commitment to the health and safety of their workers, and who operate in compliance with human rights laws. Cambium does not use or condone the use of slave labor or human trafficking, and denounces any degrading treatment of individuals or unsafe working conditions.

At Cambium Networks, we do things right. We always act with integrity – taking responsibility for our work, caring for our people and staying focused on safety and sustainability. We make investments in our clients, people and communities, so we can grow together. Guided by these values, this statement sets out the steps taken by Cambium Networks Ltd to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This statement is made in connection with our 2020 financial year, ending December 31, 2020.

### **OUR CORPORATE STRUCTURE AND BUSINESS OPERATIONS**

Cambium Networks Corporation is a Cayman Islands corporation. Its operations are conducted predominantly through its U.K. subsidiary Cambium Networks, Ltd., a corporation organized under the laws of England and Wales, with offices in Devon, England, together with its subsidiaries Cambium Networks, Inc., a Delaware corporation with its registered offices in Rolling Meadows, Illinois, and Cambium Networks Private Ltd., a corporation organized under the laws of India with offices in Bangalore, India. Cambium Networks operates research and development centers in the United States in Illinois and California, in Ashburton, England, and in Bangalore, India. As of December 31, 2020, we had approximately 512 full-time employees, of whom 306 are located outside the United States, including 108 sales personnel operating in over 25 countries.

We sell an extensive portfolio of reliable, scalable and secure business Wi-Fi, fixed wireless broadband point-to-point, point-to-multipoint, W FI and other platforms, managed by cloud-based software. We offer our wireless broadband solutions in three categories:

- PTP: Our PTP backhaul portfolio is comprised of products operating in unlicensed spectrum below 6 GHz, and those operating in licensed spectrum between 6 and 38 GHz.
- PMP: Our PMP portfolio ranges from our top-of-the-line PMP 450 series to our ePMP solutions for network operators that need to optimize for both price and performance to our cnReach family of narrow-bandwidth connectivity products for industrial communications.
- Wi-Fi: Our Wi-Fi portfolio includes our cnPilot cloud-managed Wi-Fi solutions, our cnMatrix cloud-managed wireless-aware switching solution, and our Xirrus Wi-Fi solutions.

We generate a substantial majority of our sales through our global channel distribution network, including, as of December 31, 2020, approximately 170 distributors that we sell to directly, together with over 9,000 value added resellers and system integrators supplied by these distributors. Our channel partners provide lead generation, pre-sales support and product fulfillment, along with professional services for network design, installation, commissioning and on-going field support. Although we fulfill sales almost exclusively through our channel partners, through our global sales team we engage directly with network operators in our key vertical markets including service providers, enterprises, industrials, defense and national security, and state and local governments. Our sales team responds to bids or requests for quotes, typically in collaboration with a channel partner.

We outsource production to third-party manufacturers, which are responsible for purchasing and maintaining inventory of components and raw materials and, in certain cases, we resell third-party products on a white-label basis. The majority of our products are delivered to us at one of three distribution hubs, where we have outsourced the warehousing and delivery of our products to a third-party logistics provider and from which we manage worldwide fulfillment.

## **OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

We have adopted the following policies designed to ensure our commitment to fundamental human rights. Cambium Networks continues to uphold our global code of conduct and expect our suppliers, subcontractors, distributors, resellers and other channel partners, consultants, agents and other parties with whom we do business to comply with these standards, which prohibit the use of any form of child or forced labor, slavery, or human trafficking.

- **Code of Business Conduct.** Cambium Networks prides itself on developing and maintaining a strong reputation for innovation and integrity. There are many aspects to this effort, but our first priority is ensuring that we each adhere to the highest standards of integrity and conduct; we believe that nothing that we do is more important. Our Code of Business Conduct is an essential tool to maintaining that trust by helping to guide our actions and is our guide to how our core values are translated into consistent actions worldwide. As part of our Code of Business Conduct, we prohibit the use of slave labor and human trafficking.
- **Distributor and Other Channel Contracts.** Our standard contracts with our distributors and other channel partners, including the terms and conditions of access to and use of our Connected Partner program portal and the benefits provided thereon, stipulate that our business partners comply with all applicable laws, rules and regulations including those related to human trafficking and worker welfare.
- **Supplier Code of Conduct.** We maintain a Supplier Code of Conduct, that is included as part of our corporate supply program and contracts that we enter into with our outsourced manufacturers and other suppliers. We expect all of our suppliers to adhere to this Supplier Code of Conduct, and uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community, including temporary, migrant, student, contract, direct employees and any other type of worker, as well as to uphold the highest standard of ethics.
- **Conflict Minerals Policy.** Our Conflicts Minerals Policy Cambium Networks fully supports industry-wide efforts to identify, reduce and hopefully eliminate the use of conflict minerals originating from the Democratic Republic of the Congo or adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations.

## **OUR DUE DILIGENCE PROCESSES**

Supporting our Code of Business Conduct, Supplier Code of Conduct, Conflicts Minerals Policy and other company policies and procedures, we conduct ongoing due diligence of our business partners based on international indices, media searches and other indicators of supplier risk.

## **IDENTIFYING, ASSESSING AND MANAGING THE RISKS OF SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAINS**

We outsource manufacturing of our products, predominantly to suppliers in Mexico, China, Taiwan and other locations outside of the United States. Local law in these locations may not exist or be as robust as in the United Kingdom or the United States to protect populations vulnerable to forced labor or human trafficking risks. In addition, although we outsource all of our manufacturing and do not directly procure any minerals from mines or smelters or refiners ourselves, our products include a number of minerals necessary to their operation. Some mine

operations can pose serious human rights risks and other risks for the workers and communities at the beginning of the electronics supply chain.

We expect our suppliers to adhere to our policies. In addition, we undertake a variety of actions designed to address and mitigate modern slavery risks:

- We regularly conduct third-party supplier visits and inspections when confirming a new supplier and periodically thereafter in connection with quality, yield and other reviews. Suppliers must agree to comply with the Supplier Code of Conduct as well as international standards and applicable laws and regulations when they enter into corporate supply agreements or equivalent terms and conditions with us. We require suppliers to acknowledge the Supplier Code of Conduct and their adherence to its terms and conditions, including the terms relating to ethical treatment of workers. It is our intention only to do business with companies that share our values around human rights, ethics and environmental responsibility.
- We conduct due diligence into the supply of minerals used in the manufacture of our products by requiring our suppliers to report on the status of their diligence into their supply chain and their use of components and materials originating from the Democratic Republic of the Congo or adjoining countries. We require reporting on the results of this diligence in accordance with generally accepted industry standards and reporting formats.

## **TRAINING**

We conduct web-based and/or face to face training for employees to emphasize the importance of acting with integrity and in line with our Code of Business Conduct, including the adherence to ethical practices that we require under the Code. Training topics include issues of anti-bribery, compliance with environment and employment laws as well as ethical and fair treatment including provisions such as equal employment, safe working conditions and commitment to fundamental human rights, all designed to reinforce respect for each other as one of our core values.

## **MONITORING AND MEASURING OUR PERFORMANCE**

We continuously monitor our compliance programs for improvements. Were we to find non-compliance with our core values by our suppliers, partners or employees, we would require timely remediation, potentially resulting in re-evaluation and possible termination of the relationship if remediation did not occur.

This statement has been made in accordance with the reporting requirements of Section 54 of the UK Modern Slavery Act 2015 and applies to the of Cambium Networks Ltd.

Signed



Atul Bhatnagar  
Director  
Cambium Networks, Ltd  
5 April 2021