

TalkTalk Group's Modern Slavery Statement - 16 July 2024

This statement refers to the financial year ending 29 February 2024 and sets out the steps taken by TalkTalk Group to prevent modern slavery and human trafficking in our own operations and supply chains.

1) Who we are

TalkTalk Group is the UK's leading value for money connectivity provider. We believe that simple, affordable, reliable and fair connectivity should be available to everyone.

Since entering the market in the early 2000s, we have a proud history as an innovative challenger brand. Today, we are committed to being at the heart of Britain's full fibre future and we provide broadband, landline and TV services to millions of residential customers, as well as delivering a full range of business-grade communications products and services to resellers who service residential and business customers.

Our HQ is in Salford, Greater Manchester, where most of our employees are based. We also operate in North Macedonia and have customer contact centres through third parties in the UK, South Africa, and the Philippines.

Our values and culture

TalkTalk Group is committed to delivering on our social, legal and ethical obligations. We accept responsibility for our actions and behaviours and continuously challenge ourselves to consider how we can support positive actions and outcomes in all our business operations. We also recognise that, due to our size, not only can we be a force for good with our supplier base, but we have a responsibility to support our suppliers in their own efforts to meet their responsibilities.

Our commitment to tackling modern slavery is informed by our values – we care, we challenge, and we commit.

- **We care:** about the working conditions of our colleagues and those who work for our suppliers. We follow and update our employment practices in line with legislation changes.
- **We challenge:** our operations and our suppliers to continuously improve our processes to tackle modern slavery.
- **We commit:** to tackling modern slavery risks and promoting high standards in our operations and supply chain.

Demerger of TalkTalk Business

In financial year 2024, TalkTalk Group sold its direct B2B arm, TalkTalk Business Direct Limited, which serves the connectivity needs of approximately 90,000 customers, to its major shareholders. It is therefore no longer part of TalkTalk Group and will create its own Modern Slavery Statement.

2) Relevant policies

Our Modern Slavery Statement is informed by several key policies which shape our way of doing business, including:

- **Code of Ethical and Business Conduct Policy** – this policy establishes what constitutes best conduct at work, including the requirement to live our values, follow all applicable law, act in the best interests of TalkTalk Group and challenge poor behaviour or misconduct.
- **Recruitment Policy** – this establishes the rules around recruitment, including that recruitment fees are not permitted.
- **Confidential Reporting Policy** – informs staff of our confidential reporting line, which operates 24/7, and our online reporting service.
- **Dignity at Work Policy**- which establishes that all employees have a right to be treated with courtesy, dignity and respect.
- **Health and Safety Statement** – outlining our commitment to meeting our legal obligations and any other requirements to maintain safe and healthy working conditions.

All policies are available to all colleagues on our intranet service, the Wire, and via our People Services team. All staff are also introduced to them when they join TalkTalk Group in their induction. Some policies are also referenced in employee contracts where relevant.

TalkTalk Group's staff are overwhelmingly based in the UK. However, some staff are based in North Macedonia, where employees complete training modules and can access the Confidential Reporting Policy.

TalkTalk Group also commits to paying the “real living wage” to all our UK-based staff.

TalkTalk Group also has certification to ISO 45001 – a standard for ensuring that there are robust management systems for occupational health, safety & wellbeing and is subjected to annual external audits.

Our Modern Slavery Statement, diligence and risk management contained therein are all part of TalkTalk Group's commitment to ensure that the UN Guiding Principles for Human Rights are followed.

3) Due diligence

TalkTalk Group have due diligence process built into its various operational processes, including:

- Our eSourcing tool has compulsory questions on modern slavery to assist the Procurement team supplier selection process for any new business.
- We require suppliers to answer modern slavery compliance questions in our procurement questionnaires.
- We have created mandatory training for all employees, both direct and indirect through third parties.

- We have a newly implemented Modern Slavery Risk Assessment process to identify any Modern Slavery risks.

As well as paying our staff the real living wage, our commitment to good employment has also in the past been recognised by the Greater Manchester Combined Authority, as we were accredited as a Member of its Good Employment Charter. This recognised our position as a leader in the good employment movement across the Greater Manchester region. To achieve membership status, we took part in a thorough assessment, which was reviewed and approved by a technical review panel and Charter board.

4) Risk Management

TalkTalk Group has established a specific Modern Slavery Risk Assessment process which evaluates suppliers in three main areas: high-risk countries, high-risk industries, and supplier Modern Slavery Statement compliance.

For our financial year 2024 Modern Slavery Risk Assessment, TalkTalk Group has reviewed 93% of its supplier spend, based on TalkTalk Group's financial year 2024 third party spend data.

The evaluation is as follows:

High-risk countries

Using the [2023 Global Slavery Index](#), TalkTalk Group have created a Low to High risk country index as follows, using the Estimated prevalence of modern slavery per 1,000 population, as follows:

- High-risk – a prevalence figure of 10.0 or higher.
- Medium-risk – a prevalence figure between 3.5 and 10.0.
- Low-risk – a prevalence figure of below 3.5.

Having reviewed against the above criteria, TalkTalk Group's spend with tier one¹ suppliers is as follows:

- High-risk – 0.0%
- Medium-risk – 3.6%
- Low-risk – 89.4%

The tier one suppliers who qualify as medium risk are headquartered in India. TalkTalk Group have investigated and can confirm that all have a publicly stated due diligence and governance process in place to monitor Modern Slavery.

High-risk industries

Using the 2023 Global Slavery Index and in particular the [importing risk](#) for the UK, TalkTalk Group has identified electronics from China and Malaysia as posing the largest industry risk.

¹ Tier one is defined as our primary supplier contact. However, these providers may in turn buy products and services from suppliers from other companies, who may or may not have a Modern Slavery risk. Our analysis to date has focused on our tier one suppliers.

Note this risk pertains to electronics, mobile phones, and laptops only. TalkTalk Group can confirm that any tier one suppliers TalkTalk Group licences such products from have a Modern Slavery Statement in place, as well as a Supplier Code of Conduct which sets out expectations of its suppliers to comply with Modern Slavery legislation.

Supplier spend

Our initial review covers the top 93% of supplier spend.

TalkTalk Group have conducted a Modern Slavery Risk Assessment to ensure our suppliers have a clear Modern Slavery Statement in place with due diligence and monitoring. At least 85% of our suppliers, by spend, have an externally visible public statement.

5) KPIs

Our 3 KPIs for the next financial year:

- To continue to conduct Modern Slavery Risk Assessments and address high risk areas.
- To increase the percentage of spend with companies who can demonstrate Modern Slavery Statements and governance processes.
- To roll out updated training on how to identify and prevent Modern Slavery in our supply chain to our procurement teams and other key employees.

6) Employee training

We have re-launched awareness training to ensure employees have understanding in spotting and preventing Modern Slavery and trafficking, to both existing employees, as well as new colleagues at the induction stage. This has included our employees based in North Macedonia.

7) Summary of actions and ambitions for next year

This financial year

- Increased the coverage of supplier spend covered by the Modern Slavery Risk Assessment from 90% to 93%.
- Continued to conduct a Modern Slavery Risk Assessment and evaluate whether any suppliers became High risk due to country location or industry, and contact the supplier directly to review the risk of modern slavery
- Rolled out training programme and included all North Macedonian employees.

Next financial year

- Increase the coverage of supplier spend covered by the Modern Slavery Risk Assessment to 95% of total.
- Continue to track the progress of the “Slavery at Home: a new bill to tackle slavery in Britain” Centre for Social Justice Paper and Modern Slavery (Amendment) Bill, and any changes to the Modern Slavery Act.

Declaration

This statement has been approved by the Board of Directors. A new statement will be published each financial year on our corporate website.

T Harrison

Tristia Harrison, Chief Executive Officer