

This statement covers the custom financial year of TalkTalk Business Direct Limited from 1 March 2024 to 31 December 2024 and is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by TalkTalk Business Direct Limited during the mentioned financial year to prevent modern slavery and human trafficking in our own operations and supply chains.

In previous years, our organisation has published its statement no later than 6 months of ending the financial year. We recognise that we are publishing this statement later than expected. This is due to a significant restructure associated to the demerger of TalkTalk Group.

1. Introduction

TalkTalk Business Direct Limited (TTB) has a zero-tolerance approach to Modern Slavery of any kind, whether it be from within our own operations or through our supply chain. TTB will take seriously and investigate any allegations that human rights are not being properly respected. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

2. Who we are

TTB is one of the UK's leading B2B telecoms providers, offering a full range of business-grade communications products and services, spanning internet access, data, voice and managed services. Its mission is to empower UK organisations to exceed their ambitions by delivering a trusted service and innovative solutions.

On 29 September 2023, TalkTalk Business was acquired as an independent business by TFP Telecoms Limited as part of the wider demerger of TalkTalk Group.

Our operations

Our HQ is in Salford, Greater Manchester, where most of our c.200 employees are based. We also operate customer contact centres through third parties in the UK, India and the Philippines, which are subject to our Modern Slavery due-diligence and risk assessment.

Our supply chain

To deliver services effectively to customers we rely on the operational support of technology vendors and partners alongside business suppliers. The technology vendors and partners help deliver our services to customers, including the delivery of equipment, as well as configuring and installing services. These vendors/partners have been onboarded through a rigorous procurement process which considers the risks and mitigations in place to prevent modern slavery in their own operations and supply chains.

3. Relevant policies

Our Modern Slavery Statement is informed by several key policies and processes which shape our way of doing business, including but not limited to:

- **Supplier On-Boarding procedure** - As part of on-boarding a new supplier we carry out a series of checks. We will encourage the use of our Terms and Conditions rather than the suppliers, where possible; we will not onboard a supplier without a contract.
- **Supplier offboarding procedure** – we always ensure that suppliers we're replacing or no longer need are removed from our system.
- **Anti-corruption and bribery policy** – we make sure the new supplier is a real company: and consider if a colleague has a vested interest

- **Assess the Financial Risk** – we check if this company is likely to go out of business/are they reputable.
- **Modern Slavery and Human Trafficking Policy** – we ensure awareness to all staff
- **Whistleblowing Policy** – we have a safe and secure line for reporting suspected no compliance

4. Due diligence and risk management

TTB considers its exposure to modern slavery and human trafficking to be extremely low. Nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to us. TTB has due diligence processes in place such as:

- **Supplier on-boarding process:** as outlined above.
- **Training:** We provide mandatory training to all employees on modern slavery awareness
- **Supplier screening:** we have supplier screening in place that provides assurance to us that they are a reputable business and in good standing with required laws
- **Security** – the completion of a Security Risk Assessment is completed
- **Privacy** - if the supplier is handling personal or sensitive data, the completion of a Data Protection Impact Assessment (DPIA) and thereafter a Data Processing Agreement (DPA) and / or Data Sharing Agreement (DSA) to be done.
- **Real Living Wage** – TTB pays the “real living wage” minimum to all our employees.

5. Ongoing Commitment

We will:

- Continue to conduct a risk assessment to evaluate suppliers and address all issues that may arise from high-risk countries and high-risk industries and ensure the effectiveness of our process.
- Continue employee training to ensure employees can understand, spot and prevent modern slavery and human trafficking.
- We are committed to continuous improvement and transparency in our approach.

Declaration

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

Ruth Kennedy
Chief Executive Officer