

## TalkTalk's Modern Slavery Statement 1 August 2023

This statement refers to the financial year ending 28 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 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 from small businesses through to enterprise and the public sector.

Our HQ is in Salford, Greater Manchester, where most of our c.2000 employees are based. We also operate customer contact centres directly and through third parties in the UK, North Macedonia, China, South Africa, and the Philippines.

#### *Our values and culture*

TalkTalk 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, and potential victims of modern slavery. 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.

### 2) Relevant policies

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

- **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 the company 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 a 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 the company in their induction. Some policies are also referenced in employee contracts where relevant.

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

TalkTalk also commit to paying the “real living wage” to all of our UK-based staff and require suppliers with colleagues on our premises to do likewise.

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

### 3) Due diligence

TalkTalk have a due diligence process in place, through a steering group:

- 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. This has superseded the due diligence trial referenced in the previous Modern Slavery statement.

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 has established a specific Modern Slavery Risk Assessment process which will evaluate three main areas: high-risk countries, high-risk industries and our supplier spend.

For the first year of operating this Modern Slavery Risk Assessment, TalkTalk have targeted the top 90% of our supplier spend, based on TalkTalk's full FY23 accounts.

The evaluation is as follows:

### High-risk countries

Using the [2023 Global Slavery Index](#), we 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, TalkTalk's spend with tier one<sup>1</sup> suppliers is as follows:

- High-risk – 0%
- Medium-risk – 4%
- Low-risk – 86%

The tier one suppliers who qualify as medium risk are headquartered in India. TalkTalk 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 has identified Electronics from China and Malaysia as posing the largest industry risk.

Note this risk pertains to electronics, mobile phones, and laptops only. TalkTalk can confirm that any tier one suppliers TalkTalk licence 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 90% of supplier spend.

In addition to our procurement TalkTalk have conducted a process in the first year of conducting a Modern Slavery Risk Assessment to ensure our top suppliers have a clear Modern Slavery Statement in place with due diligence and monitoring. 83% of our suppliers, by spend, have an externally visible public statement. We have contacted all remaining suppliers to request a Modern Slavery statement or policy.

## 5) KPIs

Our Modern Slavery SteerCo has identified 3 KPIs for the next year:

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<sup>1</sup> 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.

- 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 process.
- 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.

## 7) Summary of actions and ambitions for next year

### Last year

- Launched all-staff training programme.
- Created a specific Modern Slavery Risk Assessment process, assessing three main areas: high-risk countries, high-risk industries and our supplier spend.
- Reviewed 90% of supplier spend through the Risk Assessment process.

### Next year

- Increase the coverage of supplier spend covered by the Modern Slavery Risk Assessment to 93% of total.
- Continue to conduct a Modern Slavery Risk Assessment and evaluate whether any suppliers become High risk due to country location or industry, and contact the supplier directly to review the risk of modern slavery
- Roll out an updated training programme.

## Declaration

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

A handwritten signature in black ink, reading 'T Harrison', with a long horizontal flourish extending to the right.

**Tristia Harrison, Chief Executive Officer**