

This statement is made pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015. It sets out the steps taken by TalkTalk Business Direct Limited (“TTB”) for the financial year ending 29 February 2024, to prevent modern slavery and human trafficking in our own operations and supply chains.

## 1. Introduction

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.

## 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.

### Our operations

Our HQ is in Salford, Greater Manchester, where the majority of our c.200 employees are based.

We also operate customer contact centres through third parties in the UK 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 process** - As part of on-boarding a new supplier we carry out the following checks:

- **Commercial** – we will encourage the use of our Terms and Conditions rather than the suppliers, where possible; we can't onboard a supplier without a contract
- **Suppliers to be offboarded** – we always ensure that suppliers we're replacing or no longer need are removed from our system.
- **Anti-corruption and bribery** – we make sure this the new supplier is a real company: does a colleague have a vested interest, are the bank details genuine, etc.
- **Financial Risk** – we check if this company is likely to go out of business/are they reputable.
- **Security** – completion of a Security Risk Assessment.
- **Privacy** - if the supplier is handling ANY 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 staff.
- **Modern Slavery** - we have a moral and legal obligation to ensure that all parts of our supply chain respect human dignity.

## 4. Due diligence and risk management

In general, TTB considers its exposure to modern slavery and human trafficking to be extremely low. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

TTB has due diligence processes in place:

- **Supplier on-boarding process:** as outlined above.
- **Training:** engaged in training and education for employees.
- **Supplier screening:** we have reviewed our supply chain. We can confirm that in FY24, at least 90% of suppliers, by spend, had up to date Modern Slavery Statements and associated processes in place to prevent incidents of modern slavery.
- **Modern Slavery Risk Assessment:** we have introduced a process which uses the [Global Slavery Index \(2023\)](#) to assess risks in the supply chain:
  - High-risk countries of origin: using the Estimated Prevalence of modern slavery per 1,000 population, have reviewed whether any suppliers are headquartered in countries with a prevalence of 10.0 or higher.
    - Our assessment is that, assessing 90% of the supply chain by spend, no suppliers are headquartered in high-risk countries of origin
  - High-risk industries: we have reviewed Global Slavery Index, and particularly the [importing risk for the UK](#).
    - Our assessment identified laptops as a risk. We have written to the IT provider who verified that they had Modern Slavery Statement and a Supplier Code of Conduct in place for its procurement of laptops.

## 5. Ongoing commitment

We will:

- Continue to conduct a Modern Slavery Risk Assessment programme to evaluate suppliers and address 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.
- Review and monitor the “Slavery at Home: a new bill to tackle slavery in Britain” Centre for Social Justice Paper and Modern Slavery (Amendment) Bill and assess how to implement the measures.

### Declaration

This statement was approved and signed by the Board of Directors on 27 June 2024. A new statement will be published each financial year on our website.

Ruth Kennedy

**Chief Executive Officer**

**27 June 2024**