

# MODERN SLAVERY STATEMENT



This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by TalkTalk Business Ltd during the year ending 31 December 2024 to prevent modern slavery and human trafficking in our own operations and supply chains.

***Please note:***

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 (into TalkTalk Wholesale and TalkTalk Consumer). As a result, there is a Transition Services Agreement (TSA) in place with PlatformX Communications (PXC), previously TalkTalk Wholesale, which runs to September 2025 to provide continuation of agreed services to TalkTalk Business. Our continuing commitment to prevent modern slavery is dependent on services included in the TSA. Where relevant, these services are indicated by an asterisk in this document.

## 1. Introduction

TalkTalk Business Ltd (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. All employees are expected to report any concerns, using the relevant reporting channels. 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 most 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 supplier's, 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 RLW and, to maintain our status as a Real Living Wage Employer, all our suppliers also have to comply
- **Modern Slavery** - we have a moral and legal obligation to ensure that all parts of our supply chain respect human dignity.

**Source to Contract Policy\*** - this policy governs the way we source goods and services from third parties, suppliers, vendors, business partners and subcontractors.

**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 laws, act in the best interests of the company and challenge poor behaviour or misconduct.

**Recruitment Policy\*** – this establishes the rules around recruitment detailing the minimum expected standards to ensure fairness; including that recruitment fees are not permitted and recruitment agencies need to be approved suppliers and must have completed the supplier onboarding process in line with the Source to Contract Policy.

**Confidential Reporting Policy\*** – informs staff of our confidential reporting line which operates 24/7 and our online reporting service.

**Dignity at Work Policy\***- 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.

TTB commits to paying the “real living wage” to all our UK-based staff, and also has certification to ISO 45001\* – a standard that ensures there are robust management systems for occupational health, safety and wellbeing, which are subject to annual external audits.

All policies are available to TTB colleagues on our intranet service, the Wire, and via our People Team. All employees are introduced to them when they join the company. Some policies are also referenced in employee contracts, where relevant.

## 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:

- All our suppliers and partners are required to comply with our Code of Conduct\*
- Our New Supplier Onboarding process\* has compulsory supplier questions on modern slavery to assist the Procurement team
- The effectiveness of these measures is assessed through internal audits run on a three year cycle, and annual external audits, quarterly business reviews alongside customer and user experience feedback
- We have mandatory training for all existing employees, and this is required to be completed as part of the new starter induction process
- We have introduced a Modern Slavery Risk Assessment\*
  - This assessment includes a review (and identification) of high-risk countries, high risk industries and supplier spend. The initial review covered 90% of supplier spend. 83% of suppliers by spend have an externally visible Modern Slavery statement in place with due diligence and monitoring. All remaining suppliers have been contacted to request a Modern Slavery statement or policy.


## 5. Ongoing commitment

We will:

- Continue to conduct a Modern Slavery Risk Assessment programme to evaluate suppliers and address high risk areas, and ensure the effectiveness of our process
- Perform ongoing annual refresher training to ensure employees have an understanding of spotting and preventing modern slavery and human trafficking. Completion of this will be managed through the employee management portal, Engage.
- We will also explore setting up Supply Chain training for all employees.

### Declaration

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

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Ruth Kennedy

**Chief Executive Officer**