

TalkTalk's Modern Slavery Statement 1 May 2023

This statement refers to the financial year 2023 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 over four million customers. Through TalkTalk Business and TalkTalk Wholesale Services we deliver a full range of business-grade communications products and services to over 180,000 customers, from small businesses through to enterprise and public sector.

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

We recently acquired a specialist provider of wholesale telecoms services, Virtual 1. This transaction completed at the end of May 2022. Virtual 1 will continue to be run as a standalone business by its management while forming part of the TalkTalk group. In the weeks and months following the completion of the transaction, we will work with the management team at Virtual 1 to assess its compliance with Modern Slavery best practice and will ensure it is aligned to those of the group.

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 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 is also accredited by Living Wage Foundation as a Real Living Wage employer, which means adhering to the “real living wage” band set by the Foundation on an annual basis in our operations and with certain suppliers. We are subject to annual audits on our compliance, conducted by the Foundation.

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

3. Due diligence

In the last year, we formed a new SteerCo to refresh our approach to modern slavery. This group brought together the Procurement, Audit & Risk, Health & Safety, Legal and Corporate Affairs teams.

The SteerCo assessed strengths and weaknesses in our modern slavery compliance and recommended a number of actions, including:

- Establishing a new approach to due diligence, beginning with a pilot with one key supplier to inform future progress;
- Creating new training for all staff;
- Exploring options for a new external due diligence platform to establish improved supplier investigation and reporting metrics.

We have also made a number of operational changes over the last year:

- We refined our eSourcing tool to enhance the compulsory questions on modern slavery to further strengthen the Procurement team supplier selection process for any new business.
- Requiring additional information on modern slavery compliance in our procurement questionnaires.

We have also engaged with and passed the audit process for Real Living Wage accreditation. More broadly, our commitment to good employment has been recognised by the Greater Manchester Combined Authority, as we were accredited as a Member of its Good Employment Charter, which 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 a rigorous risk management process which operates across all areas of the business, and a culture in which acknowledging risk is encouraged. This culture has extended to our work on Modern Slavery.

In the coming year, we will introduce a specific Modern Slavery Risk Assessment process which will take into account three main areas: high-risk countries, high-risk industries and our supplier spend. This will be used to focus our due diligence process to our higher-risk suppliers.

5) KPIs

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

- To refine our approach to due diligence, building on this year's pilot process, and extend this to other Tier 1 suppliers;
- To implement new risk management framework with regards to modern slavery;
- To implement new training on how to identify and prevent modern slavery in our supply chain to our procurement teams and other key employees.

6. Employee training

Last year we committed to introducing a training programme to ensure employees are trained in spotting and preventing modern slavery and trafficking. This programme is due to launch in June 2022 to both existing employees and new colleagues at the induction stage.

7. Summary of actions and ambitions for next year

Last year

- Created new cross-functional SteerCo
- Designed new due diligence questionnaire and trial it with one key supplier.
- Designed training programme.

Next year

- Launch all-staff training programme.
- Refine approach to due diligence, based on feedback from trial.
- Introduce a specific Modern Slavery Risk Assessment process which will take into account three main areas: high-risk countries, high-risk industries and our supplier spend.

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 that reads "T Harrison". The signature is written in a cursive, flowing style with a long horizontal stroke extending from the end of the name.

Tristia Harrison, Chief Executive Officer