TalkTalk Group

TalkTalk Group's Modern Slavery Statement

July 2026

We are the TalkTalk Group of companies.

This statement refers to the financial year ending 28 February 2026 ("FY26") and sets out the steps taken by us to prevent modern slavery and human trafficking in our own operations and supply chains across our two businesses, being our wholesale platform business, which is trading as PXC (comprising TalkTalk Communications Limited, Virtual1 Limited and affiliated companies trading under the same brand from time-to-time), and our residential broadband business, which is trading as TalkTalk (comprising TalkTalk Telecom Limited). This statement was approved by the Board of Directors in July 2026 and signed by James Smith, Group CEO. It is published on our corporate website, as well as the TalkTalk and PXC websites, and is uploaded to the UK Government Modern Slavery Registry.

1) Who We Are

We are 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 to resellers who service residential and business customers.

Our headquarters are in Salford, with other offices and data centres within the UK. We also operate in North Macedonia, Sweden and Poland, and have customer contact centres through third parties in the UK, South Africa, India, and the Philippines.

Our values and culture

We are 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**: about the working conditions of our colleagues, and those who work for our suppliers. We follow legislative changes and update our employment practices accordingly.
- **We challenge**: our operations, and our suppliers, to continuously improve processes to tackle modern slavery.
- **We commit**: to tackling modern slavery risks and promoting high standards in our operations and supply chain.

Our supply chain

The majority of our tier one[1] supply spend comprises network and field engineering, customer premises equipment and devices, IT hardware and software, data centre and cloud services, contact centre services, marketing and professional services, and facilities. Our top tier one suppliers by spend are located predominantly in the UK and the EU, with meaningful spend in India and the Philippines for customer support services.

Limits of current visibility and plans

Our previous statements focused on tier one suppliers. As the risk environment evolves the greatest risks may lie below tier one in certain categories, for example electronics manufacturing and subcontracted services. This year, we have begun the process of surveying our tier two suppliers to form a better understanding of them and the risks they present.

2) Relevant policies

This modern slavey statement is informed by several key policies which shape our way of doing business, including our:

- Code of Ethical and Business Conduct Policies – establish what constitutes best conduct at work, including the requirement to live our values, follow all applicable laws, act in the best interests of the TalkTalk Group and challenge poor behaviour or misconduct.
- Recruitment Policies – establish the rules around recruitment, detailing the minimum expected standards to ensure fairness.
- Confidential Reporting and Whistleblowing Policies – inform staff of our confidential reporting line, which operates 24/7, and of our online reporting service used for raising concerns related to risks or unethical practices.
- Dignity at Work Policies - establish that all employees have a right to be treated with courtesy, dignity and respect.
- Health and Safety Statements – outline 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 services, and via our People Services teams. Some policies are also referenced in employee contracts, and mandatory training, where relevant. All employees complete training modules and can access the Confidential Reporting and Whistleblowing Policies.

We also commit to paying the Real Living Wage to all our UK-based staff, performs regular pay reviews for those in North Macedonia, Sweden and Poland, and has robust management systems for occupational health, safety and wellbeing.

[1] Tier one is defined as our primary supplier contact. These providers may in turn, however, buy products and services from suppliers from other companies who may or may not have a modern slavery risk.

This modern slavery statement, and the diligence and risk management contained herein, are all part of our commitment to ensure that the UN Guiding Principles on Human Rights are followed.

3) Due diligence

Due diligence is a key part of how we seek to identify, assess and address modern slavery risks in our operations and supply chain. Our approach is designed to embed modern slavery considerations into supplier selection, contracting, risk assessment and colleague awareness, with additional scrutiny applied where risk is considered higher. Together, these activities support our wider objective of preventing, mitigating and responding to modern slavery risks in a proportionate and practical way, including by implementing the following controls:

- Our procurement processes have questions on modern slavery to assist our supplier selection process for any new suppliers.
- Suppliers are asked 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 modern slavery risk assessment process to identify any modern slavery risks within our supply chain.

Standard contractual controls

We seek to influence supplier behaviour through the application of our standard terms of purchase, which form the contractual basis for the procurement of many of our goods and services across the TalkTalk Group.

Our standard terms of purchase include a specific modern slavery section, requiring suppliers to comply with applicable modern slavery legislation and to take steps to prevent slavery, servitude, forced or compulsory labour and human trafficking within their business operations. This establishes clear legal and ethical expectations and embeds modern slavery considerations into supplier relationships from the outset.

Suppliers are also held responsible for the conduct and treatment of their employees and any subcontractors engaged in delivering goods or services to the TalkTalk Group. This supports the application of responsible labour practices beyond direct employees and assists in cascading expectations across supplier workforces involved in service delivery.

Our contractual framework includes termination rights where suppliers fail to meet contractual obligations, providing an enforcement mechanism for serious non-compliance, including breaches relating to legal and ethical standards. This ensures that modern slavery requirements are not solely policy based but are supported by contractual remedies.

In addition, our standard terms of purchase include provisions relating to fair pay, including Real Living Wage requirements where applicable. These provisions support responsible employment practices and reduce labour exploitation risk by addressing pay related vulnerabilities which are recognised as a contributing factor to modern slavery risks.

Enhanced due diligence for higher risk activity

In FY26, for suppliers operating in higher risk countries, or sectors, we introduced additional steps such as follow-up questionnaires to better understand their working practices. We prioritise this activity based on our risk assessment.

Outcomes

No substantiated cases of modern slavery were identified through our channels in FY26. We recognise that not finding cases does not mean an absence of risk and we continue to look for ways to improve our identification and control strategies.

4) Risk management

We have established a specific modern slavery risk assessment process, which evaluates suppliers in three main areas: supplier modern slavery statement compliance, suppliers operating on our behalf within countries, or suppliers operating in sectors deemed as high-risk of modern slavery.

For our 2026 modern slavery risk assessment, we have maintained our review rate to 95% of our supplier spend, based on the FY26 third party spend data. The evaluation is as follows:

a) Supplier spend

We have conducted a modern slavery risk assessment to ensure our suppliers have a clear modern slavery statement in place with due diligence and monitoring. Our initial review covers the top 95% of supplier spend, with at least 94% of our suppliers, by spend, having an externally visible public statement.

b) Geographical risk

Using the 2023 Global Slavery Index, the TalkTalk Group has created a low-to-high risk country index, 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 9.9.
- Low-risk – a prevalence figure of below 3.5.

Tier one suppliers were asked to provide the locations within which their operational activity for us would be based. Having reviewed against the above criteria, the spend with these suppliers is as follows:

Risk of Slavery	% of Total Spend	Tier One Operational Locations (alphabetical)
Low Risk	88.9%	Australia, Japan, New Zealand, South Africa, UK & Ireland, USA.
Medium Risk	3.2%	Brazil , India, Israel, Philippines, Poland, Vietnam.
High Risk	0.0%	-
Total visibility	**92.1%**	

We have investigated and can confirm that any tier one suppliers operating within medium risk locations on its behalf have a publicly stated due diligence and governance processes in place to monitor modern slavery.

c) Sector risk

We assessed inherent risk by sector and service type, focusing on electronics manufacturing, where indicators such as use of migrant workers, agent recruitment and complex subcontracting can heighten risk.

Electronics Manufacturing	% of Total Spend	Manufacture Locations (alphabetical)
No	89.2%	-
Yes	2.9%	Canada, China, England, France, India, Mexico, South Korea, Sweden, Thailand, Tunisia, Vietnam.
Total visibility	**92.1%**	

Based on the information provided, all manufacture of electronics was completed by tier two suppliers.

d) Risk response

Those suppliers who operate in areas deemed medium risk, or whose equipment was manufactured within medium risk areas, were asked additional questions around topics such as grievance mechanisms, employment exit rights, and oversight of any recruitment agents or subcontractors. Where gaps are identified we will agree a corrective action plan with time-bound milestones and follow up checks.

5) Employee training

We have awareness training in place to ensure employees have understanding in spotting and preventing modern slavery and trafficking. This is provided to both new and existing employees.

6) KPIs and performance

To ensure a structured and measurable approach to managing modern slavery risks, we have established a set of key performance indicators focused on risk identification, supply chain transparency, and capability building. These KPIs are designed to ensure that modern slavery risks are effectively assessed and addressed across our operations and supply chain.

KPI	**FY26 Min. Target**	**FY26 performance**
Modern slavery statements visible (of suppliers, by spend)	95%	95%
Spend with companies who publish modern slavery statements	85%	94%
Up-to-date mandatory training rolled out to staff	Complete	Complete

7) Ambitions for next financial year

In the next financial year, we will continue to build on the actions already in place to strengthen our approach to preventing and identifying modern slavery risks across our operations and supply chain.

We plan to maintain our modern slavery risk assessment coverage at 95% of supplier spend and increase our target to 90% of spend with suppliers that publish modern slavery statements. We will also strengthen our staff training by introducing an assessment to help confirm colleagues understand how to identify and help prevent modern slavery.

8) Remediation and grievance management

If we identify modern slavery indicators, we will take a victim-centred approach. Our steps may include immediate risk reduction for affected workers, engaging specialist NGOs, requiring the supplier to implement corrective actions, and returning recruitment fees to workers where charged. We avoid abrupt disengagement unless necessary to prevent further harm and will report material cases transparently in future statements.

9) Governance and accountability

Ultimate accountability rests with the Board of Directors of TalkTalk Telecom Group Limited (“Board”). Day-to-day responsibility is delegated to the Sustainability and ESG Manager in PXC.

Declaration
This statement has been approved by the Board. A new statement will be published for each financial year.

James Smith- TalkTalk Group CEO

30 July 2026