

Slavery and Human Trafficking Statement

September 2023

Introduction

This statement is made pursuant to section 54(1), Part 6 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by Yell Holdco Limited (“Yell”) and its operating companies, including (but not limited to) its UK subsidiaries, Yell Limited and Yell Sales Limited during the financial year ending 31 March 2023 to understand and mitigate potential modern slavery risks related to its business and put in place (where necessary) steps that are aimed at ensuring there is no slavery and human trafficking in its business or supply chain.

Yell has been championing local business since 1966 when the Yellow Pages directory was first printed. Today we empower businesses and consumers in the UK to connect effortlessly via the Yell marketplace, and by offering tailored digital marketing solutions, helping businesses be found, trusted, chosen, and connected online. Yell is a proud Google Premier Partner, Microsoft Advertising Elite Channel Partner, and Meta Business Partner.

Our supply chain extends beyond the countries in which our customers are located. In particular, certain customer services and production and fulfilment facilities are located in India and I.T. services are located in the Philippines.

Yell prides itself on its long-held commitment to ethical business practices. As such, we fully support the objective of the United Kingdom’s Modern Slavery Act 2015, which requires businesses to publish on their website an annual disclosure detailing steps taken to address the possibility of slavery and/or human trafficking in their supply chains.

To find out more about the nature of our business, please click [here](#).

Policies

The Yell Code of Ethics is the foundation stone of our approach to ethical business. Its core principle is that everyone has the right to be treated with honesty and respect, and to work in a safe and healthy environment. Specifically, as regards suppliers, the Code states (amongst other things) that

We [Yell] aim to work only with suppliers who adopt ethical trading and employment practices. Suppliers should ensure their workers are treated fairly and with respect. For example, they should comply with working hour limits and minimum wage guidelines and not employ child labour. Our suppliers should ensure working conditions are healthy and safe and they should comply with all national and local laws and regulations.

We also require all of our Suppliers to commit to a separate Code of Ethics for Suppliers and to promote the same high standards through their supply chains. Our supplier agreements also include contractual clauses requiring our suppliers, their subcontractors, and their suppliers, to confirm their compliance with the Act.

The Code of Ethics for Suppliers is based on statutory requirements and internationally recognised standards set out in the UN Universal Declaration of Human Rights and the International Labour Organisation Conventions.

It specifically provides that suppliers will not employ any person below the minimum legal age for employment and will take particular steps to safeguard the interests of any workers under the age of 18. In addition, it sets strict standards as regards forced labour, working hours, minimum wage, zero discrimination, freedom of association and health and safety.

Yell also operates a confidential whistle-blowing procedure for employees to make known any concerns, including over treatment of others.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chain, we undertake supplier due diligence. The process includes a review of their modern slavery statements and supporting policies where appropriate.

Our due diligence procedures aim to:

- identify and action potential risks in our business and supply chain.
- monitor potential risks in our business and supply chain.
- reduce the risk of slavery and human trafficking occurring in our business and supply chain.

Risk and compliance

Compliance with Yell's Code of Ethics for Suppliers is a mandatory requirement for working with us. From time to time our Compliance and Procurement teams will carry out assessments to verify compliance. Our suppliers are all on notice that Yell reserves the right to terminate their contracts in the event of non-compliance. All our suppliers are expected to comply fully with all national and local laws and regulations. Should we become aware of any organisation found to have been involved in modern slavery, we would immediately cease trading with them.

Training and awareness

We are committed to operating with integrity and fairness. We have a zero-tolerance approach to bribery and corruption and our Code of Ethics sets out the expectations we have of our people across our business.

Our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity. Every new employee to Yell is trained in our Code of Ethics and this training is refreshed on an annual basis.

Further consideration and sign-off

Each year, in addition to the provision of training and compliance activity, slavery and human trafficking is considered and given due attention at board level. The management team has considered its supply chain and has assessed the level of risk relating to slavery and human trafficking.

The risk (whilst not zero) was evaluated as very low. Notwithstanding this, further enquiries were carried out by our Policy Team and at the supplier level. This involved contacting perceived "higher" risk suppliers, requiring them to confirm that they comply fully with the Modern Slavery Act.

No facts or circumstances came to light through the above process that have caused us to be concerned about the existence of slavery and/or human trafficking in the Yell group and its supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the financial year ending 31st March 2023 as approved by the Board on 20th September 2023.

Signed on behalf of the Board

A handwritten signature in black ink, appearing to read 'D Anderson', with a horizontal line extending from the end.

David Anderson
Chairman