

## TalkTalk's Modern Slavery Statement FY20

### **About us**

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 provide landline, broadband, TV and mobile services to over four million customers. We operate Britain's biggest unbundled broadband network, covering 96% of the population, supplying services to consumers through the TalkTalk brand, to businesses through TalkTalk Business, and by wholesaling to resellers.

Our UK offices are in London and Salford. We also operate customer contact centres directly and through third parties in the UK, South Africa and the Philippines.

### **Our promise**

Ethical behaviour is at the heart of everything we do at TalkTalk. We are committed to identifying and addressing any risks of modern slavery within our business and supply chains, including those of our subcontractors and partners.

### **Governance and policies**

We're proud that our people come from diverse backgrounds and cultures. Creating a vibrant, inclusive and fair working environment for everyone is a priority for us.

This year we set-up a new Corporate Governance working-group, with a sponsor from our Executive Committee, to regularly review, update and improve our policies and governance across the business.

Our HR policies and supplier contracts outline what we expect from our employees and partners and set out their obligations to comply with all applicable laws, which includes the Modern Slavery Act 2015.

We have several employee policies in place to support our aim of ensuring there are no acts of modern slavery and human trafficking in our business or supply chain. These provide our employees with all the relevant information, including advice on where to go for further information and what to do if they have any concerns. These are available to all staff on The Wire (our company intranet) and via our people services team. Some are also referenced in employee contracts. These policies include, but are not limited to:

- Ethical business conduct
- Bribery, corruption and fraud control
- Information security
- Share dealing
- Health and safety
- Confidential reporting
- Dignity at work
- Equality
- Grievance and resolution
- Immigration

Employees are required to report any misconduct as soon as possible. Our confidential reporting service is available to employees and partner colleagues. We closely monitor all cases reported through this service, and they are shared with the Chief People Officer and the relevant Executive Committee member who can take appropriate remedial action, where necessary.

TalkTalk also expects suppliers to implement rigorous processes to ensure there is no modern slavery in their operations and supply chains.

### **Due diligence and supply chains**

TalkTalk understands that the biggest risk for modern slavery is our supply chains. We will not support or work with any business knowingly involved in modern slavery or human trafficking.

Our due diligence process includes making our expectations and standards clear to suppliers.

If a supplier does not meet our standards, we will devise and implement an action plan. If suppliers and business partners fail to improve their performance, we may invoke sanctions or decide to terminate our relationship.

Ad-hoc risk-based auditing against the regulatory general conditions and compliance monitoring is currently in place for off-shore contact centre providers.

### Looking forward

We are always looking at new ways to further mitigate against the risk of modern slavery within our business or supply chains. In FY19, we conducted a business-wide review of modern slavery risk and our associated policies. The review agreed a series of additional steps to further strengthen our ability to identify and prevent instances of modern slavery in the supply chain. Because of the review, over FY20 we will:

- Further strengthen the contractual obligations on suppliers to combat modern slavery. We will introduce a new modern slavery clause in our standard supplier T&Cs, making the obligations of suppliers to comply with the Modern Slavery Act more explicit.
- Introduce a new and more rigorous process to monitor and evaluate supplier compliance with the Modern Slavery Act. We will adopt a risk-based approach to identify which suppliers are subject to additional scrutiny. For the first time, modern slavery compliance will form part of our standard annual supplier review processes. Relevant suppliers will be expected to explain their modern slavery policy, as well as setting out details of how they mitigate risks in their businesses and supply chain.

### Declaration

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

**Tristia Harrison, Chief Executive Officer**

A handwritten signature in black ink that reads "T Harrison". The signature is written in a cursive, flowing style and is underlined with a single horizontal stroke.

**Date: 1 April 2019**