

## TalkTalk Group's Modern Slavery Statement

22 July 2025

This statement refers to the financial year ending 28 February 2025 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 Group 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 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 HQ is 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

TalkTalk Group 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. We follow and update our employment practices in line with legislation changes.
- **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.

### 2) Relevant policies

Our Modern Slavery Statement is informed by several key policies which shape our way of doing business, including:

- **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 TalkTalk Group and challenge poor behaviour or misconduct.
- **Recruitment Policy** – this establishes the rules around recruitment, detailing the minimum expected standard to ensure fairness.
- **Confidential Reporting Policy** – informs 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 practice.
- **Dignity at Work Policy** - establishes that all employees have a right to be treated with courtesy, dignity and respect.
- **Health and Safety Statement** – outlines 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, and via our People Services teams. Some policies are also referenced in employee contracts where relevant.

Many of TalkTalk Group's staff are based in the UK. Some are, however, based in North Macedonia, Sweden and Poland, where employees complete training modules and can access the Confidential Reporting Policy.

TalkTalk Group also commits 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.

Our Modern Slavery Statement, and the diligence and risk management contained therein, are all part of TalkTalk Group's commitment to ensure that the UN Guiding Principles for Human Rights are followed.

### 3) Due diligence

TalkTalk Group has due diligence process built into its various operational processes, including:

- Our procurement tool has compulsory questions on modern slavery to assist our supplier selection process for any new business.
- We require suppliers 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.

#### 4) Risk management

TalkTalk Group has established a specific Modern Slavery Risk Assessment process which evaluates suppliers in two main areas: supplier Modern Slavery Statement compliance, and suppliers within countries deemed as high-risk of modern slavery.

For our financial year 2025 Modern Slavery Risk Assessment, TalkTalk Group has increased its review rate to 95% of its supplier spend, based on TalkTalk Group's financial year 2025 third party spend data. The evaluation is as follows:

##### Supplier spend

Our initial review covers the top 95% of supplier spend.

TalkTalk Group has conducted a Modern Slavery Risk Assessment to ensure our suppliers have a clear Modern Slavery Statement in place with due diligence and monitoring. At least 91% of our suppliers, by spend, have an externally visible public statement.

##### High-risk countries

Using the 2023 Global Slavery Index, TalkTalk Group has created a low to high risk country index as follows, 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 10.0.
- Low-risk – a prevalence figure of below 3.5.

Having reviewed against the above criteria, TalkTalk Group's spend with tier one<sup>1</sup> suppliers is as follows:

- High-risk – 0.0%.
- Medium-risk – 3.8%.
- Low-risk – 89.2%.

The tier one suppliers who qualify as medium risk are in India. TalkTalk Group has investigated and can confirm that all have a publicly stated due diligence and governance processes in place to monitor modern slavery.

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<sup>1</sup> Tier one is defined as our primary supplier contact. However, these providers may in turn buy products and services from suppliers from other companies, who may or may not have a modern slavery risk. Our analysis, to date, has focused on our tier one suppliers.

## 5) KPIs

Our 3 KPIs for the next financial year are:

- To continue to conduct Modern Slavery Risk Assessments and address high risk areas.
- To maintain 85% or more of spend with companies who can demonstrate Modern Slavery Statements and related governance processes.
- To roll out updated training on how to identify and prevent modern slavery in our supply chain to our procurement teams and other key employees.

## 6) 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 existing and new employees, and includes our employees based in North Macedonia, Sweden and Poland.

## 7) Summary of actions for this financial year and ambitions for next financial year

### This financial year

- We have increased the coverage of supplier spend covered by the Modern Slavery Risk Assessment, from 93% to 95%.
- Within those suppliers assessed, our spend increased with companies who have a Modern Slavery Statement from 85% to 91%.
- We have continued to conduct a Modern Slavery Risk Assessment based on supplier location.

### Next financial year

Our ambition is to maintain comprehensive coverage of supplier spend covered by the Modern Slavery Risk Assessment at 95% of total.

### Declaration

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



**James Smith, Group Chief Executive Officer**

22 July 2025