

Telecom Plus PLC ‘the Company’

Modern Slavery Statement

Introduction

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all our business relationships and undertake appropriate due diligence to identify and assess potential risk areas and mitigate the risk of slavery and human trafficking occurring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes our group's slavery and human trafficking statement for the financial year ending 31 March 2021.

This statement covers the following group entities which meet the reporting threshold requirements as set out in the Act:

Telecom Plus PLC

Utility Warehouse Limited

Electricity Plus Supply Limited

Gas Plus Supply Limited

Structure and supply chains

Telecom Plus PLC, which owns and operates the Utility Warehouse brand, is the UK's only fully integrated provider of a wide range of competitively priced utility services spanning the communications, energy (gas and electricity) and insurance markets. We have approximately 2,000 employees and most are based in the UK. We are also supported by circa 45,000 who are self-employed distributors – partners – who recommend our services to family, friend and people they know.

The Company acts as a reseller of utility services and its supply chain is dominated by large, longstanding, highly regulated companies operating in the communications, energy and insurance markets.

Policy on modern slavery

The Company is committed to ensuring as far as possible that there is no modern slavery or human trafficking in its supply chain. We will not work with any business knowingly involved in modern slavery or human trafficking.

Due diligence processes and risk assessment

The Company understands that the biggest risk for modern slavery is in our supply chains. However, the vast majority of the Company's suppliers are UK-based and not in high risk industries or supplying products or services in high risk groups.

Nonetheless, the Company applies a proportionate, risk-based approach to due diligence on suppliers taking into account factors including the relative size of the supplies being made to the Company, the nature of the supplier's business, whether the supplier operates in a highly regulated market and the geographical location of the supplier's business.

Measuring effectiveness

Where deemed appropriate, and following a risk analysis, the Company has itself visited, and commissioned independent quality reports into certain suppliers. No areas of concern have been identified as a result of these reports.

Training for staff

The Board is committed to operating the business in an honest and ethical manner and the implementation of this strategy is mainly set out in the Company's wide-ranging anti-bribery and corruption policy. The policy is detailed in the staff handbook and training on the policy

forms part of the induction of new employees. The Company operates a confidential whistle-blowing policy where employees can, if necessary, report any governance concerns they have directly to a nominated non-executive director of the Board.

The Company has a limited number of employees who are responsible for managing the relationships with the Company's supply chain. However, in order to further mitigate the risk of modern slavery occurring within the business or its supply chain, the Company is planning to conduct a review of targeted staff training in this area and introduce a more formal risk-based appraisal process for suppliers going forward.

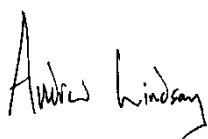
Future developments

In 2021, we aim to:

- **Develop our whistleblowing procedures which will enable employees, suppliers and partners to raise any concerns about our supply chain.**
- **Develop our supplier policies and procedures including a supplier code of conduct that sets out certain requirements for our suppliers to meet, including respecting human rights and not using child labour or forced labour.**
- **Review our staff handbook to ensure that our internal policies are current and relevant which ensures that our employees act ethically.**

Declaration

This statement was approved by the Board of directors of the Company on 23 March 2021.



Andrew Lindsay MBE

Chief Executive Officer

Telecom Plus PLC