

TelecomPlus

Human rights policy

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1 Scope

This policy provides the basis for embedding responsibility to respect human rights throughout all of our business functions and applies not only to Telecom Plus, but also to its subsidiary companies, directors, employees, workers, and contractors. It is expected that suppliers comply with the law as a minimum and should do their utmost to comply with the principles of this policy.

This policy sets out our commitment and the steps we take to meet our responsibility to respect internationally recognised human rights standards. It is guided by the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

2 Commitments

Telecom Plus is committed to respecting everyone's human rights in all aspects of our operations. Whilst we work in the UK, we believe that we also have a responsibility to ensure that human rights are understood and observed in all the areas that we work including those of suppliers who are based outside of the UK. We are committed to respecting and ensuring compliance with all internationally recognised human rights standards.

Our commitment to operating with respect to human rights is reflected in our company policies, procedures, due diligence and training.

3 Key principles

3.1 Child labour

We will not employ workers under the legal minimum age for work. We carry out annual training to relevant staff on modern slavery and how to spot and combat child labour. Our suppliers must also sign up to our Supplier Code of Conduct ensuring that no underage labour has been used in the production or distribution of goods and services to Telecom Plus.

3.2 Forced labour

Will will not make use of any forced labour or debt-bondage labour in accordance with the Modern Slavery Act 2015. Our staff are trained on modern slavery issues annually.

Our suppliers are required to sign up to our Supplier Code of Conduct outlining that Telecom Plus will not tolerate any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking in our supply chain.

3.3 Discrimination

We are committed to promoting equal opportunities in the workplace. All job applicants, employees and workers are treated fairly and equally regardless of age, disability, gender, gender reassignment, marital or civil partner status, maternity, race, social class, nationality, ethnic or national origin, religious belief, political opinion, sexual orientation or any other protected characteristic. This commitment is set out in our Diversity & Inclusion Policy. Our suppliers are also expected to adhere to the same level of compliance by signing up to our Supplier Code of Conduct.

3.4 Health and safety

We are committed to ensuring the highest standards for health and safety of employees and anyone affected by our business activities, and to providing a safe and suitable environment for employees and all those attending our premises. Our suppliers are required to provide a safe and healthy workplace environment in compliance with all legally mandated standards for workplace health and safety in the countries in which they operate.

3.5 Hours of work

Working time directives will be adhered to as per the Working Time Regulations 1998 with opt-out clauses publicised to staff. We expect our suppliers to adhere to these standards as set out in our Supplier Code of Conduct.

3.6 Compensation

We ensure that wages paid for standard working hours will meet or exceed national minimum wage or living wage levels as appropriate. Wages and benefits of our suppliers must meet legal minimums and industry standards without unauthorised deductions.

3.7 Freedom of association and collective bargaining

We respect the rights of our employees to associate or not to associate with any group, as permitted by and in accordance with all applicable local and national laws and freedom of association and collective bargaining. We do not interfere with or discriminate against anyone choosing to belong to any such group. We expect our suppliers to adhere to the same level of compliance by signing up to our Supplier Code of Conduct.

4 Key stakeholders

4.1 Suppliers

Telecom Plus is committed to socially responsible and ethical business practices and we expect all of our suppliers to share our commitments and behave in a way that upholds our values.

We integrate human rights considerations into the management of our business by carrying out human rights due diligence as part of our new supplier enrollment process. As part of this due diligence, new suppliers are required to sign up to our Supplier Code of Conduct. We will continue to assess our existing suppliers and evaluate their human rights risks and carry out human rights impact assessments on high-risk suppliers.

4.2 Employees

We seek to respect the human rights of all employees and our commitment is manifested in our staff policies such as our Anti-bribery and Corruption Policy, Diversity & Inclusion Policy and our Anti-bullying and Harassment Policy. We support employees further through our Maternity, Paternity, Shared Parental Leave and Flexible Working Policies. We also have a Whistleblowing policy for staff to raise any concerns regarding human rights. We carry out regular training for all staff involved in the procurement of new suppliers and we promote respect for human rights internally through our policies and internal forums.

4.3 Customers

We seek to respect the human rights of our customers. We are aware that some of our customers are less able to represent their own interests and more likely to suffer harm due to their vulnerability status. We also respect the privacy of our customers by ensuring the safe storage and correct use of customer data. Our staff receive annual data protection training. Further information can be found in our Privacy Policy.

4.4 Grievances

You may raise any grievance in relation to this policy by following the Grievance Policy found on the employee intranet.

This policy has been developed with reference to the following documents:

- **Anti-bribery and corruption policy**
- **Diversity & inclusion policy**
- **Anti-bullying and harassment policy**
- **Whistleblowing policy**
- **Modern slavery due diligence**
- **Supplier code of conduct**
- **Supply chain policy**
- **Maternity leave policy**
- **Paternity leave policy**
- **Shared parental leave policy**
- **Flexible working policy**

This policy will be reviewed on an annual basis to ensure compliance.

Telecom Plus PLC
508 Edgware Road
The Hyde, London
NW9 5AB

Telecom Plus PLC.
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