

## **Telecom Plus Group (“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 2023 (“FY23”). This statement provides details of our policies, our approach, and the actions we have taken during FY23 to further strengthen our commitment to identify and eradicate modern slavery and human trafficking from our supply chain and in any part of its own business.

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 2,600 employees and most are based in the UK. We are also supported by circa ,000 self-employed distributors – Partners – who recommend our services to family, friends and people they know.

The Company is, predominantly, a reseller of household services and operates in a low-risk jurisdiction and in a low-risk industry for modern slavery, bribery & corruption and human rights violations. In addition, it operates in regulated industries with significant oversight from, and reporting requirements to, Ofgem, Ofcom and the Financial Conduct Authority. Its supply chain is dominated by large, long-standing, highly regulated companies operating in the communications, energy and insurance markets.

#### **Policy on modern slavery**

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

Our approach to addressing modern slavery and human trafficking is supported by several related policies and procedures, which include:

- **Supply Chain Policy** – Sets out the standards that must be implemented across all of our supply chain activities. This policy has been developed to assist in complying with sustainable, ethical, and responsible business practices.
- **Supplier Code of Conduct** – Outlines the guidelines that we expect all suppliers working with the group to comply with, in addition to all applicable laws.
- **Human Rights Policy** – Provides the basis for embedding responsibility to respect human rights throughout all of our business functions and applies not only to the Company, but also to its subsidiary companies, directors, employees, workers, contractors, and suppliers.
- **Whistleblowing Policy** – Details our procedure for confidentially raising concerns of suspected wrongdoings and our approach to protecting whistleblowers. This policy applies to the Company and its subsidiaries, directors, employees, partners, contractors, consultants, and agency staff.
- **Staff Handbook** – Sets out our minimum expectations on acceptable behaviour of individuals in the organisation. It represents a high-level summary of key areas of our policies and standards, providing a framework to ensure we do the right thing.

### **Due diligence processes and risk assessment**

The Company understands that the biggest risk for modern slavery is in our supply chains. However, due to the business operating a reseller model, 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. Our due diligence process for all new suppliers includes modern slavery questionnaires, financial checks and a requirement that they sign up to our Supplier Code of Conduct. This process is facilitated by the Company's supplier contract lifecycle management platform.

FY23, we undertook a Group level risk assessment to assess the level of risk across our supply chain considering modern slavery, bribery & corruption and human rights violations. This assessment examined the processes that are in place and any actions required to address areas of risks.

### **Measuring effectiveness**

Where deemed appropriate, and following a risk analysis, the Company will visit, and commission independent quality reports into certain suppliers to ensure no areas of concern are identified.

### **Training for staff**

The Board is committed to operating the business in an honest and ethical manner and ensuring that employees are aware and take responsibility for implementing this strategy. As well as the aforementioned Staff Handbook, the Company also has an anti-bribery and corruption policy and training on the policy is available on the Company's e-learning platform for all employees.

The Company operates an external confidential whistleblowing hotline where employees can, if necessary, anonymously report any governance concerns.

In FY23, we continued to raise awareness of our whistleblowing policy to all employees in order to ensure there is clarity of the process to raise genuine concerns of any misconduct and wrongdoing within our business or supply chain, in good faith without fear of reprisals.

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 has dedicated staff training on modern slavery, human trafficking, human rights, anti-bribery & corruption and third-party relationship management through e-learning courses to remind our people of our obligations and expectations.

#### **Future developments**

**In 2023, we aim to:**

- **Conduct an internal review to identify suppliers that are likely to operate in high-risk countries, outsource services or workers and/or have complex supply chains and determine whether more rigorous action is required to further address the associated risks.**
- **Review our Staff Handbook to ensure that our internal policies are current and relevant.**
- **Review and refresh our group policies and procedures on monitoring and reducing modern slavery risks.**

#### **Declaration**

This statement was approved by the Board of directors of the Company on 15 June 2023.

A handwritten signature in dark blue ink, appearing to read 'AL' followed by a stylized flourish.

Andrew Lindsay MBE

**Co - Chief Executive Officer**

**Telecom Plus PLC**

A handwritten signature in dark blue ink, appearing to read 'S Burnett' in a cursive style.

Stuart Burnett

**Co - Chief Executive Officer**

**Telecom Plus PLC**