

Telecom Plus Group (“the Company”)**Modern Slavery and Human Trafficking 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 in accordance with section 54(1) of the Modern Slavery Act 2015 (“the Act”) to address any risk of modern slavery and human trafficking in our operations and supply chain and constitutes our group's slavery and human trafficking statement for the financial year ending 31 March 2025 (“FY25”). This statement provides details of our policies, our approach, and the actions we have taken during FY25 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 2,670 employees and most are based in the UK. We are also supported by circa 70,500 self-employed distributors – Partners – each seeking the opportunity to flexibly earn an additional income through referring UW to family and friends, who then choose to sign up to our services.

We are, predominantly, a reseller of household services and operate in a low-risk jurisdiction and in a low-risk industry for modern slavery, bribery & corruption and human rights violations. In addition, we operate in regulated industries with significant oversight from, and reporting requirements to, Ofgem, Ofcom and the Financial Conduct Authority. Our supply chain is dominated by large, long-standing, highly regulated companies operating in the communications, energy and insurance markets. We remain alert to the evolving risks associated with labour exploitation, particularly in light of new public procurement and supply chain transparency expectations under the Procurement Act 2023 and updated government guidance.

Policies in relation to modern slavery

The Company is committed to conducting business in a fair, accountable, and sustainable manner and while our operational footprint and supplier base are predominantly low-risk, we remain vigilant and proactive in identifying and addressing any risks of modern slavery. We will not work with any business knowingly involved in modern slavery or human trafficking.

Summarised below are our policies, which collectively set the standards we require, encompassing the prevention of modern slavery and human trafficking in the workplace and in our supply chains.

In FY25, we reviewed and updated our group policies to ensure they were fit for purpose and covered all the necessary topics in line with our key risks and industry best practice.

- **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. 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 a requirement that they agree to our Supplier Code of Conduct, financial checks, and (where identified as operating in a high-risk industry or country) the completion of our modern slavery questionnaire. This process is facilitated by the Company's supplier contract lifecycle management platform.

In FY25, we strengthened our internal procurement governance by launching a cross-functional procurement strategy and embedding procurement processes within a standalone internal procurement function. This structural improvement has enhanced our ability to assess, monitor, and manage supplier risks—including those related to modern slavery—in a more consistent and accountable way.

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. In FY25, no incidents of modern slavery or forced labour were reported within our operations or supply chains.

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 training on modern slavery and anti-bribery and corruption available on the Company's e-learning platform for all employees. We continue to raise awareness of our policies to all employees in order to ensure there is clarity of the processes and systems in place to protect against any risk of modern slavery and human trafficking.

The Company operates an external confidential whistleblowing hotline where employees can, if necessary, anonymously report any 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 2025, we aim to:

- **Continue to review any suppliers identified as medium or high risk and, where necessary, consult the internal stakeholders who own these relationships to understand the position and conduct enhanced due diligence as necessary.**
- **Review and refresh the training available to employees on modern slavery and human rights to ensure that they understand, promote and cascade it further within our Company.**

Declaration

This statement was approved by the Board of directors of the Company on 16 June 2025.

Stuart Burnett

Chief Executive Officer

Telecom Plus PLC