

Human Rights Policy

Policy Statement

Telecom Plus plc and its subsidiary companies (the “**Company**” or “**we / us**”) is committed to conducting business ethically and legally, and to respecting human rights.

This policy sets out the standards that must be implemented and maintained across the Company, and provides the basis for embedding responsibility to respect human rights throughout our business, and in our supply chain.

This policy 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.

This policy does not form part of any contract of employment, or other contract to provide services, and we may amend it at any time.

This policy cannot address every situation you might face. When in doubt, ask yourself:

- Is it legal?
- Does it comply with our policies?
- Does it reflect our values?
- Would I be comfortable if my actions were made public?
- Would I be proud to explain my decision to my colleagues and family?

If the answer to any of these questions is "no," stop and seek guidance.

This policy does not operate in isolation, and it should be read with our other policies, including our whistleblowing procedures.

Who does this policy apply to?

This policy applies to employees of the Company, contractors and consultants or any other person associated with the Company (“**you**” or “**your**”). It is expected that suppliers comply with the law as a minimum, and should comply with the principles of this policy.

Who is responsible for this policy?

The Legal & Compliance team will review this policy on an annual basis and will seek to update the policy in accordance with current applicable laws. If you become aware of any inaccuracy, error or impractical consequence in this policy, please alert our Legal & Compliance team promptly. Updated versions of this policy will be made available on Babble.

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
- Staff handbook
- Supplier Code of Conduct
- Supply Chain Policy

Roles and Responsibilities

You must read and follow this policy, and ensure that you understand:

- our commitments and how to comply with them;
- the contract management process; and
- when and how to escalate any potential compliance concerns related to human rights.

Our commitments

- **Human Rights:** We are committed to respecting everyone's human rights in all aspects of our operations. Whilst we operate 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.
- **Child Labour:** We will not employ workers under the legal minimum age for work. We will conduct Right to Work Checks to ensure that this does not happen.

- **Forced Labour:** We will not make use of any forced labour, or debt-bondage labour, in accordance with the Modern Slavery Act 2015.
- **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 identity, marital or pregnancy status, race, caste, colour, social class, nationality, ethnic or national origin, religious belief, union membership or political affiliation, sexual orientation, or any other characteristic other than the worker's ability to perform the job (subject to any accommodations required or permitted by law). This commitment is set out in our Diversity & Inclusion Policy.
- **Health and safety:** We are committed to ensuring high standards for the health and safety of employees/workers, and anyone affected by our business activities. We are committed to providing a safe and suitable environment for employees/workers, and those attending our premises.
- **Hours of work:** Working time will be adhered to in accordance with applicable laws.
- **Remuneration:** We ensure that wages paid for standard working hours will meet or exceed national minimum wage or living wage levels as appropriate.
- **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.
- **Our suppliers:** We expect our suppliers to agree to our Supplier Code of Conduct, and to adhere to the same standards and level of compliance as set out above.

Key stakeholders

Suppliers: The Company 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 supply chain through our Supply Chain Policy, and by carrying out human rights due diligence as part of our contract management process. As part of this due diligence, we ask new suppliers to sign up to our Supplier Code of Conduct.

We will continue to assess our existing suppliers, evaluate their human rights risks, and will carry out human rights impact assessments on high-risk suppliers.

Workers: We seek to respect the human rights of all employees/workers - our commitment is set out in our staff policies such as our Anti-bribery and Corruption Policy, Diversity & Inclusion Policy, our Staff Handbook, and our annual Modern Slavery statement.

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.

Escalations and raising concerns

Any individual who knows, suspects, discovers and/or is concerned that the Company is, or may be at risk of, breaching any applicable human rights commitments, or appropriate policy, should raise concerns in accordance with our Whistleblowing Policy. Doing so will help us to prevent or mitigate against possible risks associated with non-compliance.

In particular, the Company's Legal & Compliance team must be informed immediately:

- if, after entering into an arrangement or agreement in the course of the Company business, you discover and/or have suspicions that the agreement or arrangement has, or is reasonably likely to, conflict with this policy, so that an appropriate course of action can be determined; and/or
- if, upon discovering, or having reason to suspect, that any company in the group, or a third party with whom Company is interacting in any way, may have acted or be continuing to act in contravention of this policy.

If you are in any doubt about a situation that might be relevant to this policy, you should contact a member of our Legal & Compliance team. Once notified, they can determine any further actions that may need to be taken.

Individuals who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment for refusing to take part in any wrongdoing, or because of reporting in good faith their suspicion that an actual or potential offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief People Officer. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.