

Supplier Code of Conduct

Telecom Plus plc and its subsidiary companies (the “**Company**” or “**we / us**”) is committed to conducting business ethically and legally. We expect our suppliers to share our commitments and to act ethically, with integrity, and in compliance with all applicable laws and regulations.

This code of conduct (“**Code**”) outlines the standards that we expect all suppliers working with the Company to comply with, in addition to all applicable laws. Suppliers should also implement these standards within their own supply chains and are responsible for maintaining and enforcing this Code within their own supply chain.

Who does this policy apply to?

Our suppliers shall comply with this Code. We reserve the right to audit suppliers against this Code and suppliers are asked to retain documentation that demonstrates compliance. As part of our procurement process, we may ask suppliers to complete further due diligence.

Where personal data is being shared, further security due diligence will be carried out. We will seek to work with our suppliers to resolve non-compliance with the Code, but we reserve the right to terminate contracts in the event of a material breach.

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 the Legal & Compliance team promptly.

Our Code of Conduct:

Laws and Regulations

Our suppliers shall comply with all applicable laws and regulations. Suppliers shall adopt and adhere to rules and conditions of employment that respect workers and, at minimum, safeguard their rights under national and international laws and regulations.

Child Labour

Our suppliers shall ensure that no underage labour has been used in the production or distribution of goods and services to us. A 'child' is any person under the minimum school leaving age, the minimum employment age according to the laws of the country where the product (or parts of) or services are sourced from, or the minimum age for completed mandatory education.

Forced Labour

Our suppliers shall not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour, or any form of human trafficking. All work must be conducted voluntarily and without threat of any penalty or sanctions. No employee government issued identification, passport or work permit will be retained by the supplier as a condition of employment. Workers' rights to leave the workplace after their shift ends, to terminate their employment after reasonable notice, and to receive earned salary and benefits (that they are entitled to) must be recognised by the supplier. This applies to all staff.

Non-discrimination

We are an equal opportunities employer and our suppliers shall not discriminate in hiring, compensation, advancement or promotion, discipline, termination or retirement, or any employment practice based on gender, gender identity, race, caste, colour, religion, age, disability, sexual orientation, marital status, pregnancy or parenthood status, nationality, union membership, political affiliation, or any other characteristic other than the worker's ability to perform the job (subject to any accommodations required or permitted by law).

Harassment or Abuse

Our suppliers shall ensure that every employee is treated with dignity and respect. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

Freedom of Association and Collective Bargaining

Our suppliers shall respect workers' lawful rights to associate with others, form, and join (or not) organisations of their choice, including the right to form or join trade unions and to engage in collective bargaining. Suppliers shall not interfere with, harass, discriminate, or

retaliate against workers choosing to do so.

Health and Safety

Our suppliers shall provide a safe and healthy workplace environment in compliance with all required standards for workplace health and safety in the countries in which they operate. Our suppliers shall put health, safety, and wellbeing first and, so far as is reasonably practicable, prevent risks to health and safety from their undertaking.

Hours of Work

Our suppliers shall ensure working hours comply with national laws and standards and should not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation or other national legal limits, unless an opt out has been chosen by the employee with appropriate supporting written evidence.

Remuneration

Wages and benefits shall meet the higher of the minimum wage and benefits established by applicable law, collective agreements, or industry standards.

Financial Crime

Our suppliers shall ensure zero tolerance towards bribery, money laundering, fraud, tax evasion, corruption, or any other financial crime. Suppliers shall not breach sanctions or other trade controls, and shall not engage in any form of bribery or corruption or undertake any action that contravenes our Anti-Bribery and Corruption, Fraud Risk Management, or Sanctions policies. Suppliers shall have effective controls in place that prevent exposure to financial crimes such as bribery, fraud, money laundering, tax evasion, or the facilitation of tax evasion, whether they involve employees, customers or third parties.

Security & Privacy

Our suppliers shall comply with all applicable data protection laws. Suppliers shall have appropriate cybersecurity, technical, and organisational measures in place to ensure the security and confidentiality of all personal data that they process. All suppliers should familiarise themselves with our [Privacy Policy](#).

Suppliers must operate in accordance with information security best practice, including but

not limited to, keeping software up to date, limiting access to our data and systems, and installing and maintaining anti-malware software. In the event of an information security incident, the supplier should inform us within 24 hours by emailing security@uw.co.uk.

Environment

Our suppliers shall respect the environment and work to minimise resource consumption, emissions and pollution, and to reuse, recycle, and minimise waste where possible. Suppliers shall engage with us where needed and should familiarise themselves with our Environmental Policy.

Competition

Our suppliers shall compete fairly and in compliance with all competition laws and regulations.

Whistleblowing

We encourage our suppliers to report any suspected ethical or compliance related wrongdoing or actions that contravene this Code as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately. We have a dedicated third-party hotline provided by Safecall, so you can be sure that you can submit your concerns in confidence. You can contact Safecall by calling the freephone number 0800 915 1571 or report online at <http://www.safecall.co.uk/report>.