

Supply Chain Policy

Policy Statement

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 policy sets out the standards that must be implemented across all our supply chain activities. This policy has been developed to assist in complying with sustainable, ethical, and responsible business practices.

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 all employees of the Company, contractors, and consultants or any other person associated with the Company who are or may become involved with, or have oversight of, any business relationship or transaction or other dealing of the Company with a person or organisation outside of the Company (“**you**” or “**your**”).

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.

Roles and responsibilities

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

- (i) our commitments and how to comply with them;
- (ii) the contract management process; and
- (iii) when and how to escalate any potential compliance concerns related to the supply chain.

Our Commitments

We shall ensure that:

- We select suppliers with high standards of service, risk management, business continuity planning, and ethical practices. Senior management carry out due diligence on all key supplier relationships.
- As a minimum, our purchasing activities comply with all relevant legislation, regulations, codes of practice, and other requirements applicable to management of the supply chain, whilst ensuring (through our procurement contracts), that the supply chain remains compliant with all law, regulations, and our Supplier Code of Conduct.
- Our suppliers adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international laws and regulations.
- We comply with the Bribery Act 2010, the Modern Slavery Act 2015, Criminal Finances Act 2017 and the Economic Crime and Corporate Transparency Act 2023, and we require high professional ethics, standards, and conduct, from both ourselves and from our supply chain.
- Through our Supplier Code of Conduct, we encourage our suppliers to respect the rights of their workers to associate (or not), with any group, as permitted by and in accordance with all applicable laws, freedom of association, and collective bargaining.
- We ensure we are providing a safe workplace and in turn we require our suppliers to provide a safe and healthy workplace environment. We require all our suppliers to put health, safety, and wellbeing first and, so far as is reasonably practicable, prevent risks to health and safety from their undertaking.

- We deal with suppliers in a manner which is non-discriminatory, provides for equal treatment, is open and transparent, and provides for mutual recognition.
- We have an appropriate Whistleblowing Policy in place to alert us to supply chain and business issues.
- We use a contract management process to ensure: that we are contracting with the right suppliers and on the right terms; that the correct level of due diligence is carried out; and that contracts are reviewed and signed off at the appropriate level.
- Our suppliers are expected to sign up to our Supplier Code of Conduct, which sets out the standards our suppliers adhere to. We monitor our suppliers to ensure compliance with our Supplier Code of Conduct, and seek to work with any non-compliant suppliers.
- We continue to look at ways to engage further with our suppliers to promote responsible business practices.
- We act in accordance with our Staff handbook, Human Rights Policy, Anti-Bribery & Corruption Policy, Environmental Policy, Health & Safety Policy, Diversity & Inclusion Policy, Fraud Risk Management Policy, and Anti-facilitation of Tax Evasion.

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 supply chain 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 Legal & Compliance team must be informed immediately:

- if, after entering into an arrangement or agreement, in the course of the Company's 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; or
- upon discovering, or having reason to suspect, that a third party with whom the 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.