ESG Report

Year ended 31 March 2024

TelecomPlus

Contents

Foreword 2

Approach and strategy 3
About this report 3
Ratings and awards 3
FY24 Highlights 4
Our story on a page 5
ESG governance 6
Engaging with our stakeholders 7
Materiality - Identifying and prioritising what matters most 8
Our ESG strategy 9

Environment - our journey to net zero 10
Our net zero transition plan 11
Tree-planting at UW 14
Objectives and key results FY25 and beyond 18

Customers - looking after our customers 19
Helping our customers to use energy more efficiently 20
Protecting our customers' data, privacy and online safety 20
Protecting vulnerable customers 21
Objectives and key results FY25 and beyond 22

Employees and Partners - Empowering & supporting our employees and Partners 23
Employees 25
Diversity and Inclusion 27
Partners 30
Objectives and key results FY25 and beyond 32

Responsible business - doing business responsibly 33
Maintaining reliability of supply, service and product delivery 34
Ensuring robust and responsible supply chain management 35
Ensuring robust governance and transparency of the Partner model 36
Objectives and key results FY25 and beyond 37

UW Foundation 38

Appendix 40
Appendix 1 - GRI content index 40
Appendix 2 - Management approach tables 51
Appendix 3 - Disclosure tables 55
- Environment 55
- Social 57
- Governance 67

Appendix 4 - Double materiality key topics and definitions 72

Foreword

This year we were delighted to pass our one million customer milestone - we are helping more UK households than ever before to stop wasting time and money. As families across the UK continue to face ongoing cost of living challenges, we are very proud of the role we play in helping our customers and Partners navigate those challenges.

We have made strong progress on our ESG strategy, the objectives we set out in our FY24 ESG Report, and in embedding sustainability into how we operate as a business.

Progressing our climate and net zero agenda remains a key focus. Our updated energy supply contract enables us to develop products that suit our customers and proposition as the UK moves towards net zero. We also continue to support UK tree planting and ecological restoration projects, and are pleased to have signed a new partnership with Moor Trees to support the restoration of temperate rainforest and other native woodland across Dartmoor.

Through our unique business model we share the benefits we derive as an integrated multiservice supplier with our customers by giving them sustainable long-term savings on their essential household services. We recognise the need to continue to support our vulnerable customers - in June 2023 we opened our dedicated energy prepayment customer service hub in Selkirk, Scotland, where we now have over 65 colleagues trained to provide support to those in greatest need. We also continued our support of customers who need assistance with their bills through our Ability to Pay teams and through the UW Hardship Fund, which is administered in partnership with the Citizens Advice Bureau.

On our diversity and inclusion agenda, not only have we exceeded our targets for management roles held by women and employees from ethnically diverse backgrounds, but we have also developed and launched our UW Belonging Groups, with six groups created over FY24. We also conducted a Diversity and Inclusion audit, the findings of which will help us shape the future of this agenda at UW, ensuring we create an environment where everyone feels they belong and can develop to their full potential.

Our Partner opportunity offers hard-working people, from all walks of life, the ability to flexibly earn an additional income to help offset the rising cost of living. We are delighted that we have been able to quantify the positive socio-economic impact of our Partner opportunity, with 86% of the Partners who responded to our survey saying that being able to earn flexibly through UW had improved their quality of life.

We are incredibly proud of how we have delivered for the environment and our customers, employees, and Partners over the course of the year whilst maintaining sustainable long-term growth for the business. Looking ahead, our FY25 ESG objectives demonstrate our continued commitment to progressing our ESG strategy, and we look forward to progressing this further over the year ahead.

Andrew Lindsay, MBE
Co-CEO

Stuart Burnett
Co-CEO

About this report

This ESG report (the report) covers Telecom Plus PLC (the Company) and its subsidiaries (the Group). The Company trades as Utility Warehouse or 'UW' and all UW customers are based in the UK.

The report covers the financial year 01 April 2023 to 31 March 2024 (FY24). We publish our ESG Report annually and it compliments our full year Annual Report and Accounts for FY24 (Annual Report).

The report has been prepared with reference to the Global Reporting Initiative Standards (GRI Standards) and compares our progress against the targets we set last year and presents our objectives and initiatives for the coming year. The GRI Standards create a common language for organisations and stakeholders, with which the economic, environmental, and social impacts of organisations can be communicated and understood. The GRI Standards are designed to enhance the global comparability and quality of information on these impacts, thereby enabling greater transparency and accountability of organisations.

The report complies with the eight reporting principles outlined by the GRI as being fundamental to achieving high quality sustainability reporting: accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.

Ratings and awards

ESG Ratings

In 2024, Telecom Plus PLC received a rating of AA (on a scale of AAA-CCC) in the MSCI ESG Ratings assessment. In May 2024, Telecom Plus PLC received an ESG Risk Rating of 9.9 and was assessed by Morningstar Sustainalytics to be at negligible risk of experiencing material financial impacts from ESG factors.

Rated MORNINGSTAR | SUSTAINALYTICS

MSCI ESG RATINGS AA

CCC | B | BB | BBB | A | AA | AAA

Awards

During the year, we have also received a number of consumer awards including:

Uswitch Energy Awards Best Customer Service **Winner 2024**

Uswitch Energy Awards Best Value for Money **Winner 2024**

defaqto ★★★★★ Home Insurance 2017-2024 EXPERT RATED

Moneyfacts ☆☆☆☆☆ Home Insurance 2018 - 2024

Trustpilot ★★★★★ Rated Excellent

Copyright 2024 Morningstar Sustainalytics. All rights reserved. This publication/article/section contains information developed by Sustainalytics (www.sustainalytics. com). Such information and data are proprietary of Sustainalytics and/or its third party suppliers (Third Party Data) and are provided for informational purposes only. They do not constitute an endorsement of any product or project, nor an investment advice and are not warranted to be complete, timely, accurate or suitable for a particular purpose. Their use is subject to conditions available at https://www.sustainalytics.com/legal-disclaimers. In no event shall the ESG Risk Rating be construed as investment advice or expert opinion as defined by the applicable legislation.

The use by TelecomPlus PLC of any MSCI ESG Research LLC or its affiliates ("MSCI") data, and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation, or promotion of TelecomPlus PLC by MSCI. MSCI services and data are the property of MSCI or its information providers, and are provided 'as-is' and without warranty. MSCI names and logos are trademarks or service marks of MSCI.

FY24 highlights

1 MILLION

Passed our 1 million customer milestone.

92,000+

Installed over 92,000 smart meters - an increase of 23.5% resulting in a 70% penetration rate amongst our energy customers.

£681,610

Committed a further £681,610 to tree-planting projects to support ecological restoration, including a major new tree-planting project in Dartmoor with Moor Trees.

£555,000

Deployed over £555,000 from our Hardship Fund - providing a lifeline to both UW and non-UW customers as the increased cost of living continues.

Conducted an internal supply chain review for human rights and modern slavery risks.

Enhanced female and ethnically diverse representation in our management roles to 46.2% and 34.4% respectively.

£162,000

Continued to support numerous good causes, donating over £162,000 to charities through the UW Foundation.

Opened a dedicated energy prepayment customer service hub in Selkirk, Scotland to enhance support to our vulnerable customers.

Quantified the positive socio-economic impact of our Partner opportunity.

Launched six Belonging Groups - helping employees come together to share individual and collective experiences, provide peer-to-peer support, raise awareness, and advocate for change.

We help people stop wasting time and money

UW is the UK's only genuine multiservice provider of household utilities: we bundle **energy**, **broadband**, **mobile** and **insurance**.

We want people to stop having to think about the cost and hassle of running their home.

Which is why we offer long-term savings on household bills and an experience people never need to switch away from.

We grow when happy customers choose to become UW Partners and talk about us to their friends and families.

Through getting paid for referring people to UW, our Partners also get to achieve their personal goals.

We now have over **one million** customers and are on track to hit our medium term target of helping another one million households to stop wasting time and money on their bills.

ESG governance

It is important that our ESG strategy becomes embedded across the broader business in order to support company performance and culture. ESG impacts on multiple stakeholders including customers, employees, Partners and investors. As a result, it is critical that our ESG strategy becomes integrated across all of our functions. To support this aim, our ESG governance is focussed on regular collaboration, effective challenge, and robust reporting in order to ensure rigour, transparency, effective implementation, and strategic oversight, thereby ensuring that we deliver on our ESG strategy and help drive our business priorities at the same time.

This year we strengthened our ESG governance through more regular reporting to the Board and with an increased number of ESG Strategy Committee meetings.

The **Board** has ultimate responsibility for our ESG strategy, our Co-CEO Andrew Lindsay has responsibility for overseeing our ESG Strategy. Our Legal & Compliance Director prepares monthly Board updates on ESG-related matters.

The Audit & Risk Committee monitors risk management and internal controls, including ESG related risks. The internal controls in respect of ESG topics are reviewed and updated annually by our Legal & Compliance Director and the Head of Sustainability.

The **ESG Strategy Committee** supports the Board in its strategic and operational oversight of ESG. The Committee considers and monitors ESG-related goals and initiatives. The ESG Strategy Committee is chaired by our Legal & Compliance Director and is formed of our Co-CEOs, CFO, Company Secretary, Executive Leadership Team, Head of Sustainability, and is attended by members of our Business Leadership Group and our ESG Working Group. The Committee meets every quarter. The Legal & Compliance Director is responsible for developing, managing and implementing our ESG strategy and is supported by our Head of Sustainability on the operational aspects of ESG.

The **ESG Working Group** manages the day to day ESG-related goals and initiatives on behalf of the ESG Strategy Committee. The ESG Working Group meets every six weeks and reports back to the ESG Strategy Committee on a quarterly basis. The Working Group comprises the functional and operational ESG leads across the business, is chaired and led by our Head of Sustainability, and is supported by specialist external consultants, as required.

Engaging with our stakeholders

We regularly communicate with our employees, investors, Partners, suppliers and regulators, to gather insight and understand their priorities, views, concerns and needs. We use a variety of tools and methods to do so, from our employee 'Heartbeat' survey to bilateral meetings with investors.

Stakeholder	Details
Customers	• Customer service interactions • Social media • Trust Pilot • Partner feedback • Feedback from partnership with Citizens Advice Plymouth
Employees	• Dedicated intranets for all staff and people leaders • Employee meetings - Town halls (x8 per year), All Hands (x4 per year) • Employee surveys (x3 per year) • D&I Audit • Belonging Groups
Partners	• Facebook Group • Partner Marketing Forum • Partner Training Forum • Monthly Partner Leader call • Partner conferences (Power Up and Amplify)
Investors	• Bilateral meetings with investors • Investor roadshows • Broker feedback
Suppliers	• Supplier evaluation • Regular meetings with main suppliers
Board	• Board representation on quarterly ESG Strategy Committee • Monthly Board updates • Board representation on Climate-related Financial Disclosures working groups
Regulators	• Industry, regulator and DESNZ advocacy/engagement • CEO and director roundtables with Ofgem, DESNZ and Citizens Advice • Ofgem bilaterals and consultations • FCA bilaterals • Energy UK committees • Ofcom bilaterals, industry meetings, consultations and via UKCTA • ICO collaboration workshops

Materiality

Identifying and prioritising what matters most

In FY23, we carried out a comprehensive 'Double Materiality' assessment to gain insight into which ESG topics are the most important to our business and our stakeholders. The methodology we used assessed which ESG topics our business has the greatest impact on - 'impact materiality' and which ESG topics impact our business the most - 'financial materiality'.

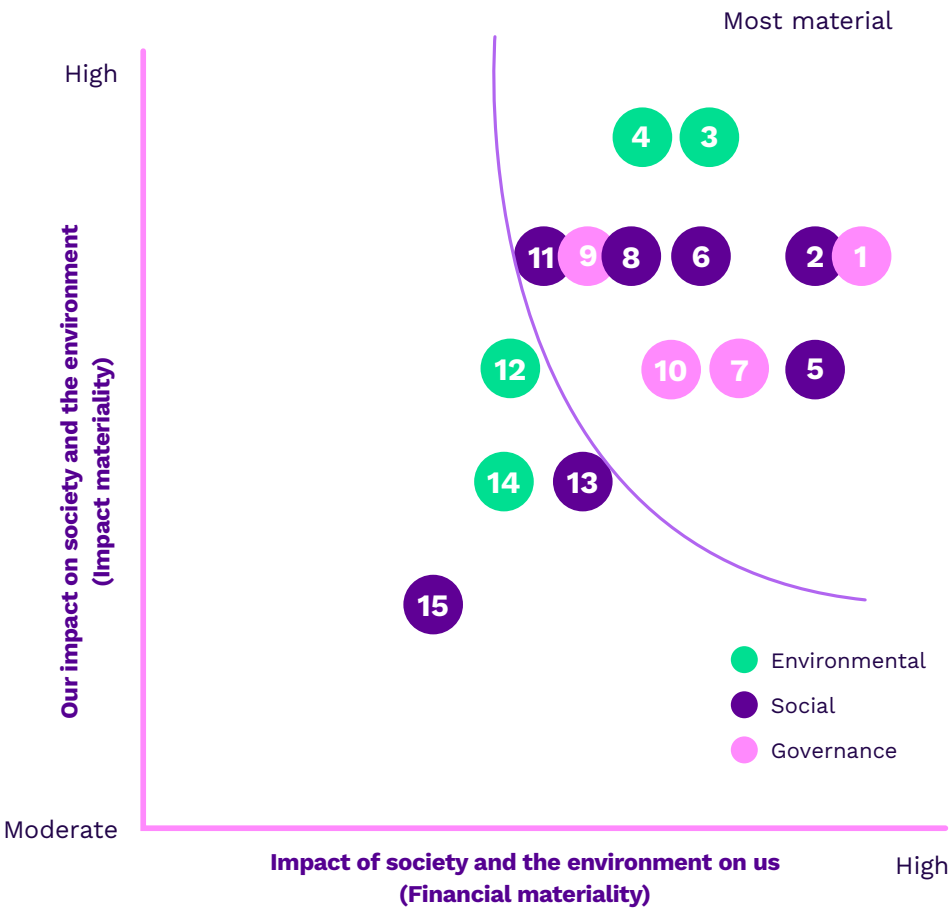
We:

1. Identified key topics through value chain analysis. These were then cross-referenced and aligned to external standards, including GRI Standards and SASB. The full list of key topics, and their definitions, are included in Appendix 4.
2. Assessed the relative impact the business has on each key topic to determine the 'impact materiality'.
3. Asked our stakeholders (customers, investors, employees, suppliers, Partners, Business Leadership Group and the Board) to rank which key topics have the greatest impact on our business 'financial materiality'.
4. Ranked the key topics using both the impact materiality results and the financial materiality results to determine our 11 most material topics. These are shown in the top right corner of the Materiality Matrix with the full definitions of our 11 most material topics included in the table below.

In FY24 we refreshed our 'Double Materiality' assessment to ensure that our ESG strategy focus remains relevant in an ever changing context. We combined desktop analysis of industry changes and trends with insight sessions held with key internal stakeholders at UW (employees and Partners). The outputs were aggregated with insight from stakeholder engagement and feedback received throughout the year from investors, Partners, customers and employees.

The outcome of this materiality assessment informed, and continues to drive, our ESG strategy.

Double Materiality Matrix



Key topics

1 Governance, business ethics & transparency
2 Inspiring, developing & supporting our people
3 Reducing greenhouse gas emissions
4 Energy efficiency advice
5 Protecting vulnerable customers
6 Cybersecurity
7 Business resilience & continuity of supply
8 Positive economic impact on communities
9 Human rights & supply chain management
10 Responsible sales & marketing
11 Diversity & Inclusion
12 Circular economy
13 Customer health, safety & well-being
14 Nature & biodiversity
15 Communities & charity

Material topics

Our ESG strategy

In FY23 we refreshed our ESG strategy to focus on our material topics. These have been grouped into four strategic pillars that continue to underpin our ESG strategy.

	Environment	Customers	Employees and Partners	Responsible business
	Our journey to net zero	**Looking after our customers**	**Empowering and supporting our employees and Partners**	**Doing business responsibly**
Objectives	01 To achieve net zero emissions by 2050, across scopes 1, 2 and 3	04 Help our customers to use energy more efficiently	07 Develop and embed a performance and efficiency approach that drives cultural mindset shifts	10 Support the long term sustainable growth of the Company through effective ESG governance
	02 Procure renewable electricity for all UW-operated buildings	05 Protect our customers' data, privacy and online safety	08 Continue to build diverse employee communities, where all UW employees feel a strong sense of belonging, allowing them to thrive and grow	11 Ensure robust and responsible supply chain management
	03 Continue to develop our green product offering	06 Enhance support for vulnerable customers	09 Increase the Company's socio-economic impact by promoting the Partner opportunity as an additional income to a wider audience	
Material topics	• Reducing greenhouse gas emissions	• Energy efficiency advice • Cybersecurity • Protecting vulnerable customers	• Inspiring, developing and supporting our people • Positive economic impact on communities • Diversity and Inclusion	• Governance, business ethics and transparency • Business resilience and continuity of supply • Human rights and supply chain management • Responsible sales and marketing

UW Foundation

Contribute £350,000 to the UW Foundation and our tree planting initiatives

Plant a tree on behalf of all new customers who take 3 or more core services, and employees who reach their fifth anniversary with UW

Environment

Our journey to net zero

We are committed to working towards a more sustainable, low-carbon future. Climate change is a challenge we all must face and we want to play our part in the UK's path to net zero. This year we further developed our Task Force on Climate-related Financial Disclosures (TCFD) through quantitative analysis (see pages 47 - 54 of our Annual Report).

We are pleased to report on the progress against our FY24 environmental commitments:

The Environment pillar covers the following material topic:

- Reducing Greenhouse gas emissions

This topic aligns with the following UN Sustainable Development Goals:

Target 7.2: By 2030, increase substantially the share of renewable energy in the global energy mix

Target 13.1: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries

Objective	FY24 commitment	Progress during FY24
To achieve net zero emissions by 2050 across Scopes 1, 2 and 3	Develop a net zero transition plan that is Transition Plan Taskforce-aligned by the end of FY25, including setting an interim target to reduce emissions by 63% across Scopes 1, 2, and 3 by 2035 (all targets to be verified by SBTi)	Ongoing - developing our Transition Plan Taskforce-aligned net zero transition plan will be a key focus for FY25. We will begin work on SBTi target verification following the SBTi's major revision of the Corporate net-zero standard (which is ongoing in calendar year 2024).
Procure renewable electricity for UW operated buildings	Move to renewable electricity at our Selkirk Hub by FY25	Achieved - our Selkirk Hub, which is a serviced office, is on a renewable electricity tariff. All UW operated sites are on a renewable electricity tariff that is PPA & REGO-backed.
Continue to develop our green product offering	Refresh our green product offering by the end of FY25	Ongoing - our updated energy supply contract provides a framework for us to refresh our green customer product offering, and to develop innovative 'time of use' tariffs (suitable for EV charging, home generation, and storage).

Our net zero transition plan

In FY23 we developed our long term and interim net zero[1] targets and initial net zero transition plan, based on detailed modelling of our emissions trajectory. This includes assumptions on external factors that, as a reseller, will strongly influence our decarbonisation ability - namely our key suppliers' decarbonisation plans, and the UK government's published projections on the decarbonisation trajectory of the UK energy grid.

This work engaged stakeholders throughout the business, increasing the collective understanding of the need to reach net zero, the challenges of doing so, and the potential paths forward for the business.

Set out below is a summary of our net zero targets, emissions and initial plans. Since we committed to develop our initial transition plan, draft guidance from the Transition Plan Taskforce (TPT) has been published. We welcome a standardised framework for climate transition plan disclosures, and will continue to work on our transition plans and future disclosures to align with TPT and other relevant guidance as it emerges.

Our net zero targets

We are committed to the following:

- achieving a target of net zero emissions on or before 2050, across scopes 1, 2 and 3, in line with a 1.5°C world;
- using an FY22 emissions baseline, we will set an interim target to reduce emissions by 63% across Scopes 1, 2, and 3 by 2035; and
- obtaining validation of our targets by the Science Based Targets Initiative (SBTi), the gold standard voluntary body on emissions target setting.

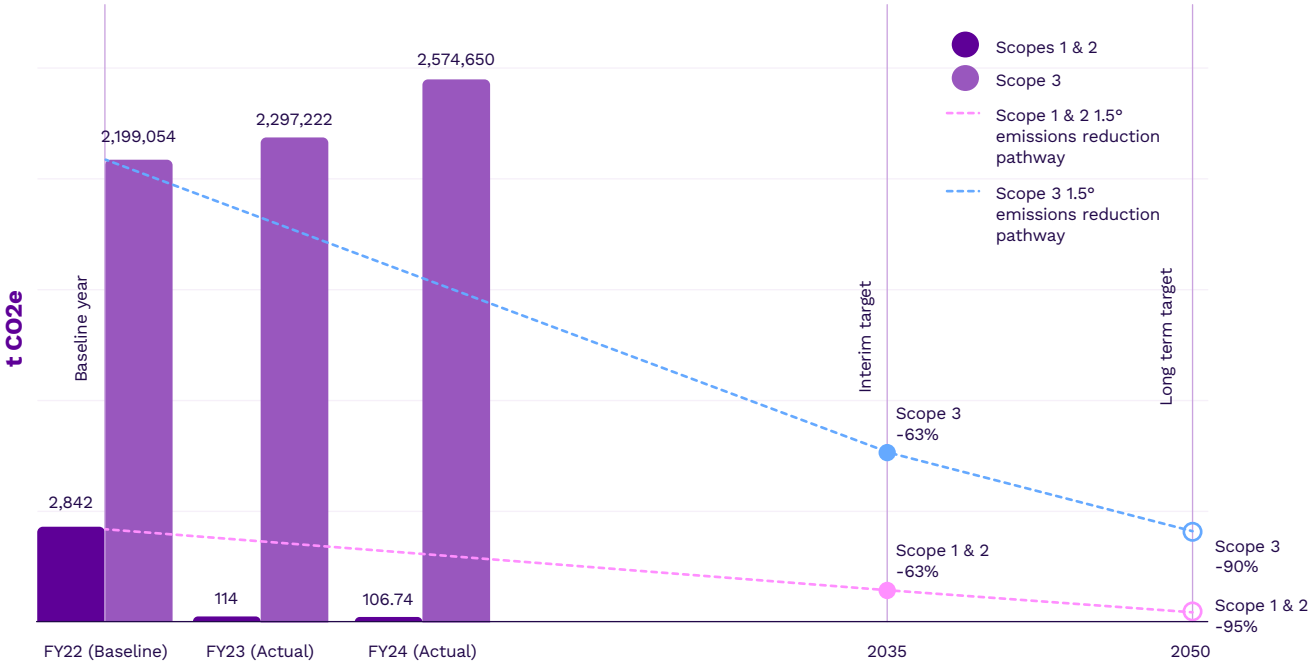
Building on our work so far we will develop a transition plan that is Transition Plan Taskforce-aligned by the end of FY25.

Scope 1

Our Scope 1 emissions are from the fuels used in heating our buildings and from the small fleet of vehicles we own.

Our FY24 Scope 1 emissions are 80.03 tCO2e - a 95.45% reduction from our FY22 baseline. This significant reduction is due to: using our buildings more efficiently; the sale of the majority of our historic fleet of vehicles; the sale of

Our emissions, progress and decarbonisation plans



1. "net zero" as used herein means the Science-Based Targets Initiative ("SBTi") net zero definition, from the SBTi net zero Standard (https://sciencebasedtargets.org/resources/files/Net-Zero-Standard.pdf) pursuant to which we are committed to (a) reducing our scope 1, 2 and 3 greenhouse gas (GHG) emissions to zero or a residual level consistent with a 1.5°C pathway and (b) will neutralise the impact of any residual emissions by permanently removing an equivalent volume of GHG emissions.

Our net zero transition plan continued

UW Home Services Limited in March 2022 and the sale of UW's 75% shareholding in Glow Green Limited in July 2022.

To reduce our remaining Scope 1 emissions we have identified, at a high level, potential projects to further decarbonise how we heat our buildings. We will further develop and refine our plans in the coming years.

Scope 2

Our Scope 2 emissions are made up of the electricity we purchase to power our buildings. Since April 2022 we have procured a 100% renewable electricity tariff for UW owned and operated buildings. In FY24 this was through a named asset and Renewable Energy Guarantees of Origin (REGO) backed tariff. Alongside the buildings that we own and operate, we also utilise serviced office spaces for our UW Hub offices. Our Selkirk Hub is already on a renewable electricity tariff.

Through the structural changes outlined above, and the procurement of renewable electricity in FY24, our scope 2 emissions reduced by 97.54% from our FY22 base line, from 1085.30 tCO2e to 26.71 tCO2e (according to market-based accounting methodology).

Going forward we remain committed to our objective to procure renewable electricity for all UW operated buildings. This includes maintaining the current scope of renewables coverage and we will seek to ensure that all UW Hubs are on or are transitioned to renewable electricity by the end of FY26.

Scope 3

The vast majority of our scope 3 emissions are made up of the emissions associated with the products we sell, particularly the electricity and gas we sell to our customers (which makes up over 95% of our overall footprint).

Our scope 3 emissions also include purchased goods and services (including Partner holiday incentives), waste generated in our operations, leased assets, use of sold products, and business travel.

This year our overall scope 3 emissions increased by 12.08% from FY23 to 2,574,650.11 tCO2e. This was primarily driven by a 20% increase in customer numbers. From our baseline year, scope 3 emissions have increased by 17.08%.

To decarbonise our scope 3 emissions we continue to work closely with key suppliers, including E.ON (our wholesale energy supplier) to minimise our emissions wherever possible.

Supporting our customers and the wider net zero transition

We recognise that there is an important role for UW to play to support our customers as the UK transitions to net zero. In this context we are working to develop our green product offering.

This year, we continued to support our customers in helping them use energy more efficiently and generate renewable energy at home. Our smart meter rollout and energy efficiency advice is covered in the customer section of this report on page 20. To support low-carbon energy generation we offer a Smart Export Guarantee (SEG) tariff, which pays self-generating households for any excess renewable electricity they don't use themselves and export to the grid. In FY24 our SEG tariff rate was 2p/kWh for customers taking just one or two of our core services, and 5.6p/kWh for customers taking three or more of our core services. We saw an increase of approximately 375% in customers benefitting from our SEG tariffs since the previous year.

As a conservationist and environmentalist, I am passionate about protecting our planet for future generations - that's why it's so important to see companies like UW playing their part in the journey to net zero.

Ben Fogle, UW Brand Ambassador and Customer

Our net zero transition plan continued

Last year we committed to refresh our green product offering by the end of FY25. Over FY24 we laid strong foundations to achieve this commitment through our refined wholesale agreement with E.ON. The amended contract provides a framework for UW to develop innovative 'time of use' tariffs (suitable for EV charging and home generation & storage).

Residual emissions & offsetting

We recognise the need to prioritise investment in decarbonisation, and understand that while offsetting emissions is not the solution, in the short term it allows some contribution to the transition to net zero. With this in mind, where it is not possible to reduce our scope 1 and 2 emissions, or those from hard to abate activities (such as flying), we will continue to use appropriate offsetting projects. As we work toward SBTi target validation we will update our policy on residual emissions and offsetting to align with latest SBTi guidance.

We have been offsetting our Scope 1 and 2 emissions since FY21. This year we have been able to offset FY24 Scope 1, Scope 2, and scope 3 emissions from business travel flights and Partner incentives, which amounts to 1764 tCO2e. We calculated the amount of offsets needed using the location based Scope 2 methodology.

We worked with our offsetting partner Ecologi to purchase 1800 tonnes of carbon credits. We have chosen to fund a portfolio of projects that have been curated to maximise the impact of our funding. We are supporting projects that balance carbon avoidance and carbon removal, are aligned to the Oxford Principles for net zero aligned carbon offsetting guidance, and make contributions across a range of environmental and social outcomes. Details of the projects we have funded are outlined in the table below and more information is available on Telecom Plus Ecologi profile.

Supporting a circular economy

We recognise that there is increasing demand for key raw materials such as lithium, cobalt and nickel, that are necessary to build a range of technologies needed in the net zero transition. In addition, the increase in electronic waste generation is a growing concern[2]. This is leading to a growing focus on creating a more circular economy as a potential solution.

Although the majority of our environmental impact comes from the carbon emissions associated with the energy and other services we sell, we provide routers to our broadband customers and sell small numbers of handsets.

Recognising the increasing challenges of electronic waste, and the imperatives of building a more circular economy going forward, one of the key ways we are able to support this is through our router refurbishment scheme. We take back routers from customers and refurbish them ready for use by a new customer. In FY24 10,081 of the routers we shipped were from refurbished stock.

As the circular economy agenda develops we will continue to give consideration to areas we can develop and implement best practice.

Objective	Solar Power project	Katingan Peatland Restoration	Delta Blue Carbon
Amount (tCO2e)	850	850	100
Country	Morocco	Indonesia	Pakistan
VIntage	2018+	2019	2020
UN SDGs supported	1,3,4,6,9,10,3,15	3,7,8,13	1,2,3,4,5,6,7,8,10,13,14,15
Type	Solar	REDD+	Blue Carbon ARR
Standard	Gold Standard	VCS +CCBS	VCS +CCBS
Category (Oxford Taxonomy)	Avoidance (I)	Avoidance (I)	Avoidance (IV)

2. https://unu.edu/media-relations/releases/global-e-waste-surging-up-21-in-5-years.html

Tree-planting at UW

Bringing woodlands back to the UK

We take a considered, long-term approach to supporting woodland recreation projects that are putting life back into the UK, creating a legacy for our customers and employees. Our commitment to planting trees is helping to create natural spaces that enhance wildlife and provide immeasurable benefits to people, nature and our planet.

Since 2020, UW has supported tree planting projects that conserve and restore biodiversity in the UK. We've committed to plant a tree every time a multiservice customer, taking three or more new services, joins UW and every time an employee achieves their five-year anniversary with the company.

This commitment has grown from supporting one forward-thinking, bold restoration project in the Brecon Beacons in 2020, to a programme of support that now includes projects in England, Wales and Scotland.

Since FY21 we have committed to plant 338,294. Between FY21 and FY24, our tree planting partners have planted 391,791 trees on our behalf, meaning we are currently ahead of our tree planting commitment.

Our vision is to enable people passionate about the natural heritage of the UK to restore and create some of our most biodiverse habitats. The projects we support are helping to reverse the decline of native species, create wildlife corridors, improve soil stability, reduce flood risk, lessen the impacts of drought, improve water quality, sequester carbon, and bring balance to fragile landscapes. They will also create opportunities for people to enjoy wonderful experiences within nature, boosting mental wellbeing and creating community connections.

217,578
trees planted in FY24

£681,610
committed to tree planting projects in FY24

466,786
further trees to be planted FY25-FY27, ensuring we can support our ongoing tree planting commitment as UW grows

We're proud to support four unique woodland creation projects which share our commitment to considered, long-term restoration of British woodland.

> **At UW we're extremely proud of the incredible projects and natural spaces that our commitment to tree planting is helping to create. These efforts will continue to bring benefits to our customers, staff and their communities for many generations to come.**
>
> **Andrew Lindsay, Co-CEO of Telecom Plus**

Tree-planting at UW continued

Stump Up For Trees

Stump Up For Trees, based in the Brecon Beacons/Bannau Brycheiniog National Park in Wales, was the first tree planting project supported by UW in 2020. Back then the founders, Keith Powell and Rob Penn, had a bold plan to plant native woodland on Bryn Arw, a single hillside overgrown with bracken. We're extremely proud that UW's funding enabled Stump Up For Trees to bring their vision to life, developing a considered approach to working with common landowners and securing community buy-in for habitat restoration. This considered project, ensuring the best possible outcomes for nature and people, has informed UW's approach to woodland creation ever since.

We've continued to support Stump Up For Trees as they've scaled their ambition, funding the planting of almost 250,000 trees since 2020. The charity has advised landowners at over 200 sites. In FY24 we supported the planting of 91,364 trees over 63 sites across the Brecon Beacons, with 3,000 hours of community volunteer planting, bringing 33.8 hectares of land into management for nature. Our funding has also contributed to ecological surveys, and the long-term maintenance of our very first project on Bryn Arw.

A further 200,000 trees are due to be planted over the next two winters. Find out more >

UW's support has been instrumental. Their confidence and foresight to support Stump Up For Trees before a single tree was in the ground demonstrates a genuine commitment to create positive change for people and nature in the places where their customers live.

Rob Penn, Founder and Director of Stump Up For Trees

Tree-planting at UW continued

Tree planting and establishment with the National Trust

Since 2022, we've supported the National Trust in its ambition to plant and establish 20 million trees by 2030, focusing on the recreation of temperate rainforests. These lush habitats of ancient oak, birch, ash, pine and hazel that once blanketed most of western Britain and Ireland have been reduced to green pockets now representing just one percent of British land use.

In FY24, our funding supported the National Trust to plant 51,214 trees at Arlington Court, contributing to a project to restore 50 hectares of ancient rainforest in North Devon. Most of the estate is classified as Grade 3-4 moderate-poor quality agricultural land and includes around 50km of water courses, 20 miles of paths, 7 farm tenants, and receives 90,000 visitors per year. The Trust's vision, following the wishes of Miss Rosalie Chichester who bequeathed the estate to them in 1949, is to create a "wilder, wetter and woodier, more resilient Arlington Estate, managed for maximum benefit for nature and people. An estate that is accessible and inspires all, is sustainable and contributes to thriving communities locally in North Devon."

This funding was initially intended to support a project on the Sugar Loaf in Wales, but as this project was not able to go ahead we were happy to reallocate funds to projects in North Devon and Exmoor where a further 168,786 trees will be planted with UW's support over in the coming years.

Find out more >

© National Trust Images/Trevor Ray Hart

Gruinard Island

In FY24 our funding helped to plant 75,000 trees on Gruinard Island on the west coast of Scotland, with a further 8,000 in April 2024. The uninhabited rocky island became known as 'the island of death' after biological weapons testing in World War II left it contaminated with anthrax. Following decontamination by the Ministry of Defence, the island was declared safe in 1990. Now a bold plan by the landowners is turning 31 hectares of coarse grasses, heather and bracken on the southeast side of the island into biodiverse woodland of alder, birch, willow and oak.

UW's funding enabled this logistically challenging project to get off the ground, supplementing a grant from the Scottish government. More than 14 tonnes of tree saplings were helicoptered onto the island before being planted by a team through the harsh Scottish winter.

Now in the ground, the trees will grow to form habitats for nesting birds and other wildlife. Over the next 60 years silver birch will give way to oak, creating a natural mixed woodland that, in time, will regenerate the island's ecology, improving soil quality and biodiversity.

Our commitment to tree planting going forward is set out on page 38 alongside our wider UW Foundation commitment.

UW's funding has enabled the planting of over 83,000 trees on Gruinard Island. Our hope is that the Island will remain wooded forever, with regeneration of indigenous woodland in addition to the planted trees. This will provide habitat and shelter for wildlife that did not exist previously.

Angus Dixon, Forester, Groves Forestry

Moor Trees

In March 2024, we signed a new agreement to support Moor Trees to plant 90,000 trees between November 2024 and April 2027. This funding will help the charity to restore temperate rainforest and other native woodland across Dartmoor, creating wildlife corridors and new opportunities for people to enjoy nature. Our support is enabling the charity to significantly expand its efforts as they pursue their ambition of a third of Dartmoor National Park covered in trees and scrub, compared with just 12% today.

Find out more >

Environment objectives and key results for FY25 and beyond

Looking ahead to our FY25 ESG strategy, our environment pillar will focus on continuing our journey to net zero through delivery against the following objectives and key results:

Objective	Key results
01 To achieve net zero emissions by 2050 across Scopes 1, 2 and 3	**Develop a net zero transition plan that is Transition Plan Taskforce-aligned by the end of FY25, including setting an interim target to reduce emissions by 63% across Scopes 1, 2, and 3 by 2035**
02 Procure renewable electricity for all UW-operated buildings	**Seek to ensure that all UW Hubs are on or are transitioned to renewable electricity by the end of FY26**
03 Continue to develop our green product offering	**Refresh our green product offering by the end of FY25**

Customers

Looking after our customers

Families across the UK continue to face strong inflationary pressures. We remain proud of the role we are playing in helping customers navigate the challenges this creates. Through our unique business model, we can share the benefits we derive as an integrated multi-service supplier with our customers, giving them sustainable long-term savings on their essential household services.

One of our FY24 objectives was to enhance support for vulnerable customers. One way we have done this is through the opening of a dedicated energy prepayment customer service hub in Selkirk, Scotland in June 2023, where we now have over 65 colleagues trained to provide support to those in greatest need.

We also continued our support of customers who need assistance with their bills through our Ability to Pay teams, and through the UW Hardship Fund, which is administered in partnership with the Citizens Advice Bureau. We are pleased to report on the progress against our FY24 customer commitments:

The Customer pillar covers the following material topics:

- Energy efficiency advice
- Protecting vulnerable customers
- Cybersecurity

These topics align with the following UN Sustainable Development Goals:

Target 1.4: By 2030, ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance

Target 7.3: By 2030, double the global rate of improvement in energy efficiency

Objective	FY24 commitment	Progress during FY24
Help our customers to use energy more efficiently	Exceed our Ofgem specified target for smart meter installation during calendar year 2023	Not achieved - While we fell short of our Ofgem specified targets, we installed 92,753 smart meters in calendar year 2023, up from 75,104 in 2022, and now have a penetration rate of 70%, against a market average of 60%.
	Develop and promote energy efficiency advice initiatives by end of FY24	Partially achieved - In FY24 we promoted energy savings advice to customers via our website and our app, with a combined 17,939 visits in FY24. Our dedicated phone line, provided by Scarf, had 133 calls in calendar year 2023. (Due to the mechanics of the data capture, this metric is reported for the previous calendar year, rather than the financial year).
Protect our customers' data, privacy and online safety	Achieve ISO27001 certification for our energy operations by end FY25	Ongoing - We are on track to obtain our ISO27001 certification by the end of FY25.
Enhance support for vulnerable customers	Supporting the deployment of a UW-funded £5 million Hardship Fund over FY24-FY26 by Citizens Advice	Ongoing - Over FY24 £555,864 was deployed from the Hardship Fund through Citizens Advice Plymouth to both UW and non-UW customers.

Helping our customers to use energy more efficiently

We're committed to helping our customers manage the energy they use in their homes, not only to enable them to better control their energy costs, but also to further support the UK's transition to net zero. Key initiatives to support this aim concern our smart meter rollout programme, and providing energy efficiency advice:

Smart meter rollout

The industry-wide smart meter rollout is a vital element in the UK's transition to net zero, supporting a more efficient and flexible electricity grid. The adoption of smart meters and the free in-home display has many benefits to customers, including making it easier for them to understand and track their energy usage, which in turn helps them to take steps to save energy. Alerts can be set for when they're using more energy than they want to, providing further control over their consumption. And as readings are sent automatically, it also helps them to avoid paying too much or building up a debt, as bills are based on actual rather than estimated readings.

In line with regulatory changes, our internal smart meter target has been replaced with specific Ofgem specified smart meter installation targets, and are for a calendar year (rather than a financial year). We installed 92,753 smart meters in the calendar year 2023, up from 75,104 in the calendar year 2022 - a significant increase of 23.5%. Our penetration rate amongst our customers also increased to 70%, against a market average of 60%. While we fell slightly short of our calendar year 2023 target of 101,061, we are committed to exceeding our 2024 target, and will continue to encourage our customers to transition to smart meters.

Energy efficiency advice

We offer energy efficiency advice on our website and via a dedicated energy efficiency telephone line, helping to support our customers who are looking for ways to reduce their own carbon emissions, and save money in doing so. The number of customers visiting our energy efficiency webpage reduced to 17,939 visits in FY24, down from around 65,000 in the previous year. We attribute this significant reduction to the receding of the energy crisis resulting in fewer consumers seeking advice. In the calendar year 2023, our dedicated energy efficiency phone line had 133 calls. This phone line is operated by Scarf and provides independent advice to both consumers and businesses.

During FY25 we are committed to developing tools to allow customers to monitor and budget for their energy consumption, helping to avoid bill shocks.

Protecting our customers' data, privacy and online safety

We remain committed to protecting our customers' data, privacy and online safety.

Online safety

Our Stay Safe Online webpage continues to inform our customers about security risks. We also offer our fixed broadband customers eero routers, which allow them to put in place parental controls to keep their families safe.

Data and privacy

Protecting our customers' data and privacy is critical to our business and something we continue to invest in. We have robust information security and data privacy policies maintained and governed by our Security Operations Center and Data Privacy teams. All our staff are provided with security and privacy training, and our call centre agents are provided with additional training on how to deal with customer-related security issues. We have grown our Data Privacy team and scaled our resources to ensure that we continue to protect our customers' rights to privacy as customer numbers grow. We also continue to invest in our cybersecurity, and have a dedicated Security Operations Center, who are active members of FIRST (first.org), working alongside our security engineering and compliance teams. We participate in a number of industry threat intelligence programs to ensure we are can quickly respond to the constantly changing information security landscape. We remain fully committed to continuing to improve our information security systems and are working to achieve ISO 27001 certification for our energy operations by the end FY25.

Protecting vulnerable customers

Continuing to support our vulnerable customers, particularly in the context of the rising cost of living, remains a key priority within our ESG agenda. Key initiatives to support this aim include our partnership with Citizens Advice Plymouth, our UW Hardship Fund, the creation of our UW Vulnerability Working Group, and the opening of our Selkirk Hub:

Citizens Advice Plymouth

Over the last year, we have continued to partner with Citizens Advice Plymouth to support vulnerable customers. Our UW funded team of advisors at Citizens Advice Plymouth provide dedicated support to UW customers in financial difficulty, with guidance available for budgeting, increasing household income, and extending financial support in certain cases.

UW Hardship Fund

Over FY24, our UW Hardship Fund (which is administered in partnership with the Citizens Advice Bureau), deployed over £550,000 - providing a lifeline to both UW and non-UW customers as the increased cost of living continues to impact families across the UK.

UW Vulnerability Working Group

In November 2023, our FY24 Executive Vulnerability Sponsor, Sheryl Jermyn (Legal & Compliance Director), led our inaugural Vulnerability Working Group meeting. This newly established cross-functional group has been created to further align the plans, actions and support for vulnerable customers across our products and services. A key focus for FY24 concerned the development of our 'Digital First' customer journey trial, providing customers with an option to complete their own self-assessment on vulnerability digitally, rather than via telephone. Our COO, Rob Harris, is our Executive Vulnerability Sponsor for FY25 - he will continue to further the aim of the Vulnerability Working Group, with a particular focus on the operational side of our vulnerability processes.

Selkirk Hub

In June 2023 we opened our Selkirk Hub in the Scottish Borders. Our Selkirk Hub handles the majority of our customer service prepayment meter calls, with the aim of further developing our prepay customer experience, whilst also offering the right levels of empowerment, knowledge, and support for our advisors. We recognise that effectively supporting our prepay customers requires unique skills and knowledge to provide the best service to customers. By creating a specialist hub, we're able to deep dive into the customer journey, better understand what we do well, and identify areas we can develop further.

> **The creation of our Vulnerability Working Group has significantly helped ensure support for our vulnerable customers is aligned across all of our products and services.**
>
> **Rob Harris, COO,**
> **FY25 Executive Vulnerability Sponsor**

Customer objectives and key results for FY25 and beyond

Our customer pillar will focus on continuing to look after our customers through delivery against the following objectives and key results:

Objective		Key results
04	Help our customers to use energy more efficiently	**Exceed Ofgem specified target for smart meter installation during calendar year 2024 (17,947 electricity smart meters and 27,682 gas smart meters)** **By the end of FY25 develop tools to allow customers to monitor and budget for their energy consumption, avoiding bill shocks**
05	Protect our customers' data, privacy and online safety	**Achieve ISO27001 certification for our energy operations by the end of FY25**
06	Enhance support for vulnerable customers	**Supporting the deployment of a UW-funded £5 million Hardship Fund over FY24-FY26 by Citizens Advice**

Employees and Partners

Empowering and supporting our employees and Partners

Our employees and Partners are the driving force behind the business. Inspiring, developing, and supporting our employees and Partners is a fundamental part of our culture and key to our continued success.

Moreover, with the continued cost of living challenges, we are proud of both the employment opportunities we offer, (with our new hub in Selkirk being a great example of how we are supporting local communities), but also the ability for hard-working people from all walks of life to flexibly earn an additional income through our Partner opportunity.

The Employees and Partners pillar covers the following material topics:

- Positive economic impact on communities
- Inspiring, developing and supporting our people
- Diversity and Inclusion

These topics align with the following UN Sustainable Development Goals:

Target 8.5: By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value

Target 10.2: By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status

Target 5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life

Objective	FY24 commitment	Progress during FY24
Evolve our distinct UW culture to attract, develop and keep great people	Maintain an Employee Net Promoter Score (eNPS) of +25 by the end of FY24	Achieved - Our average FY24 aggregate eNPS was +26.
Continue to build diverse employee communities, where all UW employees feel a strong sense of belonging allowing them to thrive and grow	At least 40% of all management roles will be held by female employees at the end of FY25	Achieved / Ongoing - 46.2% of management roles held by women.
	At least 30% of all management roles will be held by ethnically diverse employees at the end of FY25	Achieved / Ongoing - 34.4% of management roles held by ethnically diverse employees.
	Undertake a Diversity and Inclusion audit by end of FY24	Achieved - We worked with an external diversity and inclusion consultancy to conduct an independent audit on our internal processes, policies, and culture. The results are informing our strategy going forward.
	Launch UW belonging networks, open to all employees, by end of FY24	Achieved - Six Belonging Groups were launched in FY24 - Working Parents, African-Caribbean, UW Pride, Women in Leadership, Menopause Support Group, and our Carers Network.
Increase the Company's socio-economic impact by promoting the Partner opportunity as a second income to a wider audience	Quantify the social impact of the UW Partner opportunity by the end of FY24	Achieved - We worked with an expert external consultancy to develop a framework to measure the impact of the UW Partner opportunity.

Employees

Over FY24 we have begun embedding our distinct UW culture to attract, develop and keep great people.

Created by the people who live and breathe it, UW employees, our culture comes to life in everything we do. From the way we answer the phone to how we work together and deliver on big projects and goals, it runs through us and is a part of everyday life at UW. We launched our DNA, the guiding principles for our People at our company All Hands in October 2023.

Attract great people

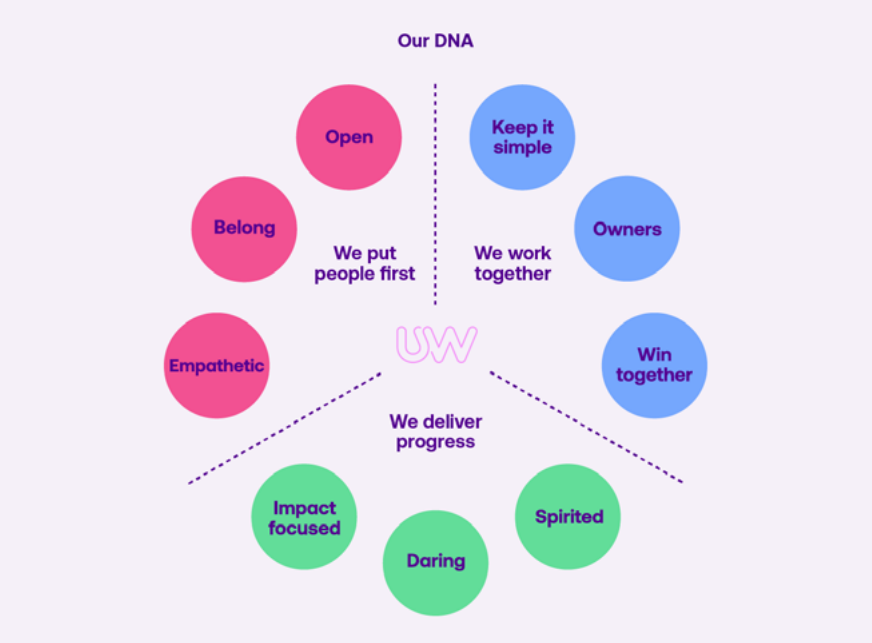
This year saw us hiring at scale, notably filling 799 vacancies between April and September to meet the demands of our growing customer base. One of our core priorities for FY24 focussed on reducing attrition amongst our Customer Service Advisors. As we drove key initiatives in this space, from reinventing how we hire to improving our employee experience, we successfully saw a reduction in voluntary attrition from 46% to 32%. This positively impacted our hiring landscape, reducing the need for replacement hires over the year.

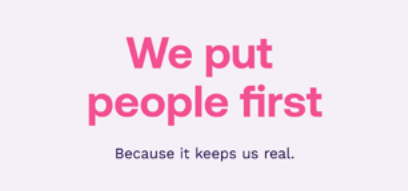
With the introduction of our Selkirk hub, the team focused on recreating our in person onsite assessment centres to ensure we continued to hire the right people who will stay with us and perform well. Thinking creatively to promote UW as an Employer of Choice in a small community, we secured a partnership with Borders College, along with attending other local events to successfully develop our presence as an employer in the area.

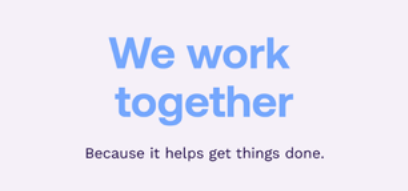
Following last year's launch of our Smart Recruiters internal careers portal, which supported our desire to drive internal mobility and employee referrals, we saw an increase from 12% to 25% of roles across UW filled by internal team members and 164 new hires come through employee referrals. 54% of our internally filled roles were occupied by females, and 52% filled by individuals from under-represented minority groups. Our Refer a Friend scheme continued to play an important role in attracting great talent, which saw an increase in costs through this medium.

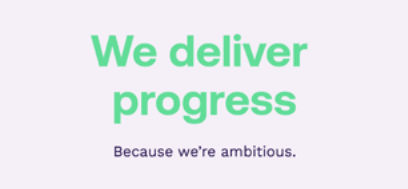
As market conditions changed, we were well positioned to attract great specialist talent in our Core and Tech teams. Our employer brand perception became more favourable, and our approach to hybrid working continued to stand out as competitive. We continued to focus on ensuring our attraction strategy removed any bias and supported the attraction of diverse talent, which saw a result of 42% of externally filled vacancies filled by females and 62% of externally filled vacancies filled by individuals from under-represented minority groups.

As we codified our culture, we worked with the business to define our key talent personas and build our attraction messaging for these groups (Technology Teams, Core and Commercial Teams and Customer Facing Teams). We also embedded cultural assessments into our recruitment screening process.









Employees continued

Develop great people

Building on the success of launching our approach to learning with Spark, we aim to support and empower our people at UW to connect, learn, and grow, driving both personal and professional performance. Spark is all about making it easy for our people to access the development they want and need, to perform and support their personal development no matter what role they hold.

Although Spark is for all at UW, we know that in order to make progress with our cultural shifts we need to disproportionately focus on our People Leaders. They are multipliers of behaviour and performance. We have invested in developing our leaders at all levels more than ever before over the last year. From front-line new leaders to our Executive Leadership Team, our whole leadership community has engaged with Spark to develop their leadership capability. We have supported the development of our People Leaders at all levels, here are some highlights:

All leaders can now access our leadership fundamentals programme, designed to support new or less experienced leaders in learning (or re-capping) the basics of leadership.

We support teams to be as effective as they can with a series of self serve toolkits designed to help create high performance in a team.

We support our senior teams and leaders with tailored coaching and support at a team and individual level.

We have introduced an approach to talent reviews for senior leadership teams, giving us a view of those who have low and high levels of performance and potential.

Keep great people

Our continued focus on people capability will help us to further embed our culture and drive our cultural shifts - this is crucial not only to develop great people, but also to give them reasons to continue building their career at UW.

We have a range of benefits available to our employees through Our Purple deal. Our aim is for our people to have the ability to optimise and flex their total reward package in line with their personal needs and circumstances. Through our benefits portal, employees can easily understand and access the range of benefits available to them. We continue to offer a share option scheme and discounts on UW services for members of staff. Further details on Our Purple deal are available on our career site.

More information on our culture and how it is helping us to attract, develop, and keep great people is available on pages 28 - 32 of our FY24 Annual Report and Accounts.

Engagement

We recognise the importance of listening to our employees and continue to create opportunities for them to give feedback. In addition to our Heartbeat engagement survey, which gives employees opportunities to give feedback three times a year, we also hold regular listening sessions within each function and our Belonging Groups.

Last year we set ourselves a target to maintain an Employee Net Promoter Score (eNPS) of +25 in FY24. We are delighted that we achieved an aggregate eNPS of +26 in FY24, alongside a response rate above 80%.

People are most positive about:

- the people they work with
- the support they get from their managers, particularly around wellbeing
- work/life balance
- feeling trusted to do their job
- opportunities to learn and develop

By listening to our employees' feedback, we've implemented changes including:

Revising our approach to pay reviews, making sure we are paying a fair market rate for every role.

Revamping our service anniversary scheme to better reward our employees for their commitment to success, with cash bonuses and additional annual leave.

Introducing the UW holiday guarantee for our customer service advisor roles.

Refreshing our recognition scheme to align with our DNA and behaviours.

Going forward our focus is to develop and embed a performance and efficiency approach that drives cultural mindset shifts. We have set a target that 100% of eligible People Leaders have goals by the end of FY25.

Diversity and Inclusion

We are fully committed to continuing to build diverse employee communities, where all UW employees feel a strong sense of belonging, allowing them to thrive and grow. We ensure that full and fair consideration is given to opportunities for employment, training, career progression and promotion on the basis of each individual's ability, attitude and track record, irrespective of their gender, ethnic origin, nationality, age, religion, sexual orientation, or disability. Importantly, we want to maintain an environment that reflects the diversity and characteristics of the customers and communities we operate in, and which is free from any form of harassment, bullying and discrimination.

FY24 progress

46.2%
of management roles held by women vs target of 40% by end of FY25

34.4%
of management roles held by ethnically diverse employees vs target of 30% by end of FY25

200
People Leaders have attended our Making Inclusive Decisions Workshop which now runs monthly

75%
In our FY24 Heartbeat surveys 75% of people said they feel they belong at UW

We topped the 2023 FTSE Women Leaders Review in the telecommunications sector

We also continue to take actions to create an environment where we highlight, educate, inform, support and celebrate uniqueness – creating an environment where everyone belongs and can bring their whole self to work, contribute their best work, and develop to their full potential.

Diversity and Inclusion audit

In FY23 we committed to undertake a Diversity and Inclusion audit by the end of FY24, to really understand the current situation and areas we need to focus on going forward. Over the course of the year we worked with an expert Diversity and Inclusion consultancy to conduct an independent audit on our internal processes, policies, and culture. The audit collected views from all levels of the organisation, and engaged our Executive Leadership Team in understanding what the results meant and in developing our response and action plan. We want UW to be a company where everyone gets their needs met. Based on the audit findings we have already begun work on a number of the recommendations and we have committed to develop UW's Diversity and Inclusion vision and action plan by the end of FY25.

Diversity and Inclusion continued

UW Belonging Groups

This year we are really proud to have launched our UW Belonging Groups.

A Belonging Group is a community of UW employees who come together to share individual and collective experiences. They provide peer-to-peer support, raise awareness, and advocate for change. We currently have six groups that are open to all employees. Each group has been set up by passionate employees and each has support from the People team, Communication team and ELT sponsorship.

Our six Belonging Groups are, Working Parents, African-Caribbean, UW Pride, Women in Leadership, Menopause Support Group, and Carers Network.

The groups focus activity on:

- **Peer-to-peer support** - space for employees to support each other, express concerns, and spend time with people who understand their experiences.
- **Raising awareness** - promoting better understanding of issues that matter to colleagues and raising visibility of them across the wider organisation.
- **Advocating for change** - supporting the development of the Diversity and Inclusion strategy, and feeding into the development of policies and processes.

"During this stage in your life it can feel really overwhelming and this is the time when many of us welcome some support from others who know exactly how you are feeling and are going or have gone through the same things."
(Menopause Support Group Lead)

"With 14.19% of UW staff being of African-Caribbean descent, the African-Caribbean Belonging group will be a platform to enable the staff to influence positive change and ensure equal representation at all levels of the company."
(African-Caribbean Lead)

"Being a parent in whatever capacity brings challenge, joy and pure love, that's why our Working Parents community is so important to UW. We have an abundance of employees who have wonderfully diverse experiences so what better way to share this than in our Belonging Group."
(Working Parents Lead)

Diversity and Inclusion continued

Gender pay gap

We publish our Gender Pay Gap report each year in accordance with the requirements of The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017. Our latest report can be found at Telecom Plus PLC

Our gender pay gap reduced slightly, with the median pay gap reducing from 9.00% to 8.60%. Our Gender Pay Gap Report outlines our long-term approach to narrowing the gap. We are confident that the steps we are taking, combined with our new ways of working, career development plans, and our intention to appoint more executive female leaders over the coming years will result in the continued narrowing of our gender pay gap.

The Board sets the tone for Diversity and Inclusion across the business and continues to commit to the development of a diverse and inclusive organisation.

The Board has a Board Diversity and Inclusion policy, which reinforces our commitment to promote diversity on the Board and complements our wider workforce Diversity, Inclusion and Belonging policy. In addition, in May 2023 the Board's Nomination Committees terms of reference were updated to further stipulate that candidates from a wide range of backgrounds shall be considered and that due regard will be given to the benefits of diversity on the Board.

We are mindful of the increasing focus on the benefits of Board diversity, including the guidance and targets issued by the FTSE Women Leaders Review, the Parker Review, and the FCA. The Listing Rules include specific diversity targets to ensure that at least 40% of the Board are women, at least one of the senior Board positions (Chair, Chief Executive Officer (CEO), Chief Financial Officer (CFO), or Senior Independent Director (SID)) is a woman, and that at least one Director is from a minority ethnic background, requiring companies to report on a 'comply or explain' basis.

At the end of FY24 and at the date of publication of this report, we met one of these targets with Beatrice Hollond as the SID; the Board has 37.5% female representation; and there were no directors from ethnic minority groups. However, the Board will meet the Listing Rules targets following Andrew Lindsay stepping down and the appointment of Ms Bindi Karia as a new non-executive director, following the AGM in August 2024.

Going forward, we will work to ensure that our progress in achieving at least 40% of all management roles being held by female employees, and 30% by ethnically diverse employees, is embedded at the end of FY25.

Based on the findings of our FY24 Diversity and Inclusion audit, we will develop our Diversity and Inclusion vision, strategy, and action plan by the end of FY25, and we will develop a robust framework to support and amplify our UW Belonging Groups to ensure their effectiveness and longevity.

I'm delighted to see that the actions we've taken in recent years to improve gender diversity within our leadership roles are beginning to shine through within our figures. While we know we still have a way to go in achieving gender balance at all levels, we're confident that our long-term plans will result in narrowing our gender pay gap even further.

Stuart Burnett, Co-CEO of Telecom Plus

Partners

Our community of self-employed Partners continues to be instrumental to our growth. Our Partner network now has 68,251 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 and save time and money on their household bills. This opportunity is becoming increasingly relevant for people seeking more versatile ways of earning income as the cost of living crisis continues.

Quantifying the social impact of our Partner opportunity

We aim to increase our socio-economic impact by promoting the Partner opportunity as an additional income to a wider audience. Following a commitment last year to quantify the social impact of the Partner opportunity, we worked with an expert external consultancy to quantify how becoming a UW Partner can help people meet their financial goals in the short term, and also contribute to longer term socio-economic empowerment.

Developing a robust social impact framework fit for our business

Our Partners are at the heart of how we do business. We're proud that such a central part of our route to market is driving clear positive social impacts. Through regular engagement with our Partner network, we often hear stories of how becoming a UW Partner has changed people's lives for the better, but we had not previously quantified this impact. To assess the impact at an aggregate level, we developed a robust impact measurement methodology, adapting a rigorous social impact theory of change for our Partner model.

Having developed a hypothesis of our impact based on market analysis and academic sources, we surveyed 348 Partners. The survey was voluntary and open to all registered Partners. Our aim was to understand how these Partners engaged with the Partner opportunity, the outcomes they valued most, and how these impacted their lives. We also spoke directly to current Partners via telephone interviews and at UW Partner events, including our annual flagship Partner event, PowerUp.

Alongside financial impacts, UW Partners value flexibility, confidence and community:

86%
said that being able to earn more flexibly through UW had improved their quality of life.

79%
said the income they had received from UW had provided them with a greater sense of financial empowerment.

65%
had found that being part of UW had made them feel more comfortable in professional or social settings.

53%
stated that being a UW Partner had allowed them to increase their earnings outside of UW, change jobs, progress their career, or start their own business.

**Based on an FY24 survey of 348 UW Partners.*

Partners continued

We identified four social impact categories relevant to the Partner opportunity. These impact areas were used as the foundations for a new social impact framework that will inform our approach to engaging and supporting Partners.

Flexible around life

Flexibility is a core part of the UW Partner opportunity, offering unprecedented flexibility for people to earn an additional income in a way that fits around their existing commitments. 90% of the Partners we surveyed indicated that this flexibility had benefited them, with 86% saying that the ability to earn more flexibly with UW had improved their quality of life.

"Life shouldn't be about work; UW lets you spend time doing the things you actually enjoy."

UW Partner

Skills and confidence

Our Partners reported increased confidence since becoming a Partner, primarily driven from the skills they develop through UW, as well as the access to a network of like-minded people. Overall, 86% of Partners stated that the UW Partner opportunity had increased their confidence, benefiting them socially, professionally or economically.

"Without really noticing it, being a UW Partner has pushed me to do things I would never have done before."

UW Partner

Community and belonging

The feeling of community is a big part of being part of UW, both for our employees and Partners. Of the Partners surveyed, 51% reported that being part of UW had given them a feeling of shared sense of identity and collective purpose. We were proud to find that in a time when social isolation and loneliness is a growing issue in the UK, 25% of our Partners reported that becoming a UW Partner had resulted in reduced feelings of loneliness and isolation or an improved sense of social connection.

"Community is a massive part of the opportunity for me. It's about being able to trust the people around you."

UW Partner

Financial empowerment

Of the Partners surveyed, 79% said that the income they received from UW had provided them with a greater sense of financial empowerment. Our Partners valued both the opportunity to earn in the short term via commission and bonuses as well as the opportunity to build a source of residual income over time.

"What started as my Plan B is quickly becoming my Plan A."

UW Partner

What's next for our social impact framework?

The results of this work have provided important new insight on the social impact of our Partner model, and has shone a light on the benefits of the opportunity that our Partners value most.

The way people in the UK are earning money continues to change. People are placing increasing value on flexibility, but often this is coming with less secure earnings. Our findings show that the UW Partner opportunity offers one solution for people to build an additional source of earnings that fit around life's commitments.

During FY25, we will leverage the findings from our FY24 social impact study in our Partner proposition refresh, to further drive the positive impact of the UW Partner opportunity.

Employees and Partners objectives and key results for FY25 and beyond

Looking ahead to our FY25 ESG strategy, our employees and Partners pillar will focus on empowering and supporting our employees and Partners through delivery against the following objectives and key results:

Objective		Key results
07	Develop and embed a performance and efficiency approach that drives cultural mindset shifts	**100% of eligible People Leaders have goals by the end of FY25**
08	Continue to build diverse employee communities, where all UW employees feel a strong sense of belonging, allowing them to thrive and grow	**Based on the findings of our FY24 Diversity and Inclusion audit, develop UW's Diversity and Inclusion vision, strategy and action plan by the end of FY25** **At least 40% of all management roles will be held by female employees at the end of FY25** **At least 30% of all management roles will be held by ethnically diverse employees at the end of FY25** **Develop a robust framework to support and amplify our UW Belonging Groups to ensure their effectiveness and longevity**
09	Increase the Company's socio-economic impact by promoting the Partner opportunity as an additional income to a wider audience	**Leverage the findings from our FY24 social impact study in our Partner proposition refresh to further drive the positive impact of the UW Partner opportunity**

Responsible business

Doing business responsibly

We will continue delivering a high standard of service to our customers, whilst treating them fairly and living up to our promise to help them stop wasting time and money on their bills. Doing so ensures that our customers remain with us for the long term, and that we continue to earn the trusted personal referrals of our Partners.

Working with all our stakeholders in an ethical and transparent way, and conducting business in a fair, accountable and sustainable manner, inspires trust and is critical as we look to the future and our growth prospects.

Our systems and processes are built and developed to ensure high standards of compliance, data security and business continuity, and we are committed to respecting human rights across our business and our supply chain.

In FY24 we reviewed our Critical Incident Response procedure. As a result of the review, we have created a new Crisis Reporting and Management Policy, and a new Crisis Communication Plan, both of which are due to be published and communicated to all employees in H1 FY25.

We also engaged external consultants to support with a review of our supply chain, focussing on risks relating to human rights, modern slavery, bribery and corruption, and sanctions. The findings of the review reaffirmed that our supply chain is low-risk.

We increased the transparency of the mechanics and benefits of our Partner model. This included refreshing our Partner website, and including greater detail on Partner earning opportunities.

The Responsible business pillar covers the following material topics:

- Governance, business ethics and transparency
- Business resilience and continuity of supply
- Human rights and supply chain management
- Responsible sales and marketing

These topics align with the following UN Sustainable Development Goals:

Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms

Target 12.5: Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle

Board evaluation

An independent Board evaluation was externally conducted. This involved the completion of formal detailed Board, and Board committee, evaluation questionnaires by each director, as well as director interviews. The overall conclusion of the evaluation was that the Board and its Committees had operated well during the year, with the Board currently having a good combination of skills and experience, which had been proactively crafted by reference to specific requirements for commercial and professional skill sets over time. Further details can be found on pages 59-60 of the FY24 Annual Report.

Objective	FY24 commitment	Progress during FY24
Maintain reliability of supply, service and product delivery	Communicate an updated and centralised Critical Incident Response procedure to all employees by end of FY24	Partially Achieved - Our Critical Incident Response procedure was reviewed in FY24 - our new Crisis Reporting and Management Policy and our Crisis Communication Plan are due to be published and communicated to all employees in H1 FY25.
Ensure robust and responsible supply chain management	Undertake an internal review of UW supply chain (with particular focus on human rights, modern slavery, and anti-bribery and corruption) by end of FY24	Achieved - A review of our supply chain of risks relating to human rights, modern slavery, bribery and corruption, and sanctions was completed, with support from external consultants. The review reaffirmed that our supply chain is low-risk.
Ensure robust governance and transparency of the Partner model	Increase transparency of the mechanics and benefits of the Partner model by end FY24	Achieved - Partner opportunity website refreshed, including greater detail on earning opportunities.

Maintaining reliability of supply, service and product delivery

We continually review, enhance and invest in our services and products, as well as our systems and procedures, to ensure that we maintain reliability of supply, service and product delivery.

To continue to deliver reliable services and products to our customers, we regularly engage with our key suppliers and review our offering to maintain our sustainable business model and robust wholesale supply arrangements with well capitalised suppliers.

Energy

In October 2023, we refined our Wholesale Services and Supply Agreement with E.ON, ensuring UW is in a great position to compete effectively over the years ahead. Importantly, the updated agreement provides us with greater flexibility, enabling us to develop and launch a wider range of energy products - for example, a broader set of attractively priced fixed tariffs to both the residential and small business markets. The amended contract also provides a framework for us to develop innovative 'time of use' tariffs (suitable for EV charging and home generation and storage).

Broadband

Unlike most major broadband providers, we do not impose 'in contract price rises' for broadband customers, and we applied a lower price increase for those who are not in contract compared to most of the industry, increasing our relative competitive position. With consumers still focused on a reliable service, we were pleased to be voted 4th in Which? 2024 Best Broadband Survey, and our Wi-Fi home hub retained its Which? Best Buy status. We also improved our full fibre broadband proposition by adding CityFibre, via our existing relationship with Platform X Communications, as the largest independent full fibre network in the UK covering over 3 million homes.

Mobile

We introduced 5G on our new Unlimited+ tariff making it one of the best value unlimited deals in the UK, delivering 99.6% population coverage on the EE network. We also increased the amount of data on our Essentials tariff from 5GB to 8GB making it more suitable and competitive for many less intensive mobile users. Customers now also benefit from coverage on some of the London Underground, as well as Wi-Fi calling when they are connected to broadband.

Financial services

Following the approval by the Gibraltar Financial Services Commission for UWI to commence operations in March 2023, UWI has successfully completed its first full year of trading. We made on-going improvements to our unique Cashback Card proposition, including offering Google Pay functionality and adding major new retailers, including Aldi and IKEA.

Delivering a trusted and reliable service

We continue to adhere to responsible sales and marketing practices by ensuring our advertising and promotional material is clear, unambiguous, accessible, accurate and fair. Our commitment to responsible sales and marketing is borne out by the fact that we did not receive any complaints from, or via, the Advertising Standards Agency in FY24.

Our dedicated centralised Fraud team continue to track, manage and mitigate fraud at UW, helping to minimise both financial and customer impact. We have continued to invest in our customer service teams (as set out on page 21, and in our cyber security and data privacy teams (as set out on page 20).

In FY24 we also reviewed our Critical Incident Response procedure. As a result of the review, we have created a new Crisis Reporting and Management Policy, and a new Crisis Communication Plan, both of which are due to be published and communicated to all employees in H1 FY25. These will further bolster our preparedness and ability to respond effectively to any critical incidents we may face.

Ensuring robust and responsible supply chain management

Conducting business in a fair, accountable, and sustainable manner is critical to our continued success. Our systems and processes are built and developed to ensure high standards of compliance, data security, and business continuity, as well as ensuring robust and responsible supply chain management. We remain committed to future-proofing our supply chain management as our business scales.

Key policies

The following key policies facilitate robust and responsible supply chain management:

Anti-Bribery and Corruption policy: We have a zero-tolerance approach to bribery and corruption, which is embedded through our Anti-Bribery and Corruption Policy and training. Our policy describes our values and approach to counter bribery and corruption.

Human Rights Policy and Modern Slavery Statement: Our Human Rights Policy covers human rights, modern slavery, and forced labour, and provides the basis for embedding responsibility for respecting human rights throughout the Group. Our Board reviews and approves our annual Modern Slavery Statement, which is available on our website.

Supply Chain Policy and Supplier Code of Conduct: Our Supply Chain Policy and Supplier Code of Conduct set out the standards we expect our suppliers to adhere to, including respecting human rights and a zero-tolerance approach to bribery and corruption.

Whistleblowing Policy: We have a Whistleblowing Policy to encourage staff to report suspected wrongdoing (including human right violations, and bribery and corruption matters), and an independent whistleblowing hotline provided by SafeCall.

Board and Conflict of Interests Policy: Our directors have an obligation to avoid placing themselves in a position where their personal interests conflict with those of the company. This policy provides guidelines on identifying and managing conflicts of interest, and outlines the procedure to be followed in the event that an actual or potential conflict of interest is identified.

These policies, along with our Gender Pay Gap Report and our other corporate policies, can be found at Telecom Plus PLC.

Internal review of our supply chain

To ensure that we continue to effectively assess our supply chain and to appropriately consider any risks which may arise in the future, we committed to undertake an internal review of our UW supply chain by the end of FY24. This review was completed with the support of external consultants, and a particular focus was placed on human rights, modern slavery, sanctions, and anti-bribery and corruption. We are pleased to share that the findings of the review reaffirmed that our supply chain is low-risk.

We reviewed all material suppliers, accounting for 99% of our spend in the relevant period. Desk research was undertaken on material suppliers who are in a country, or operating in a sector, that we identified as having a higher risk of human rights, modern slavery, sanctions, and anti-bribery and corruption risk. High risk sectors include resource outsourcing, debt collection services, hardware distributors, meter providers/rental services, and goods.

The desk research involved reviewing the level of engagement the supplier has in managing and addressing human rights, modern slavery, sanctions, and anti-bribery and corruption risk, and was based on publicly available primary data sources. Overall our supply chain was deemed to be low risk.

To continue the development of our supply chain management, we have committed to refresh our procurement processes and procedures and embed them into a standalone internal procurement function by the end of FY25.

Ensuring robust governance and transparency of the Partner model

We are committed to ensuring robust governance and transparency of our Partner model. In FY24 we launched a webpage providing further information on the Partner opportunity - more information can be found at uw.co.uk/partner.

Our community of self-employed Partners get paid for referring friends and family who then choose to sign up as UW customers - Partners receive up to £250 for every multiservice homeowner. They can also build their own team of Partners to earn an ongoing residual income in the process. Being a Partner is rewarding and flexible and, as with most things in life, Partners get out what they put in.

1. Upfront income
Commission paid for referring friends and family who then choose to sign up as a UW customer, as well as bonuses for achieving certain stretch targets.

2. Residual income
For as long as a customer referred by a Partner, or their team, stays with UW, a monthly payment is available, based on services billed to the customer.

3. Rewards
A variety of rewards and incentives, ranging from chocolates and champagne, to meals out, weekends away and holidays in the UK and abroad.

4. Support
Training and tools, as well as mentoring and personal development, plus events for the wider UW Partner community.

Supporting our Partners from day one

To join as a Partner there is a £10 registration fee - this covers the cost of setting up an account and providing new Partner training. From month four, there is a £3 monthly fee to cover ongoing training, tools and support. They have access to the Partner app and the Partner Portal where they can access training, support and tools to help them make the most of the UW Partner opportunity.

All of our training courses have been developed with, or are delivered by, successful Partners. Training is available on a range of topics including: our products and services; data protection and information security; securing and carrying out appointments; and much more.

All Partners are required to complete mandatory training and adhere to our Partner Guidelines and our Partner Code of Conduct. These set our requirements and the standards we expect our Partners to maintain when referring UW to their friends and family. All Partners are eligible to be mentored by the Partner that introduced them to UW for at least the first six customers they refer, but in most cases, this mentoring relationship continues well beyond this initial period.

Support is also offered via formal and informal Partner events organised both by UW and by individual groups of Partners. We organise two Partner conferences a year, Power Up and Amplify, to enable Partners to network, build skills and learn more about UW, our products, and our services.

Responsible business objectives and key results for FY25 and beyond

Looking ahead to our FY25 ESG strategy, our responsible business pillar will focus on doing business responsibly through delivery against the following objectives and key results:

Objective		Key results
10	Support the long term sustainable growth of the Company through effective ESG governance	**Review and embed refreshed ESG governance structure by the end of FY25**
11	Ensure robust and responsible supply chain management	**Refresh our procurement processes and procedures and embed into standalone internal procurement function by the end of FY25**

UW Foundation

Through our UW Foundation (UWF), we continue to contribute to charitable initiatives. Over the course of FY24, employees, Partners and UWF donated over £200,000 to charities across the UK. We remain very proud of the work we do through the Foundation.

Our aim

Established in 2019 and administered by the Charities Trust (Charity Registration number: 327489), the aim of UWF is to have a positive impact on the environment, disadvantaged groups and other organisations that exist for public benefit and can demonstrate their charitable purpose.

Our commitment

In our FY23 Annual Report, Telecom Plus PLC committed to "continue to contribute 1% of reported annual profits to the UW Foundation and our tree planting initiatives". For FY24 this equated to £681,610. Going forward (and with effect from 1 April 2024), Telecom Plus PLC will move to a fixed contribution for UWF and tree planting initiatives. For FY25, Telecom Plus PLC will therefore contribute £350,000 to the UW Foundation and our tree planting initiatives.

FY24 fundraising and direct donations

We encourage our employees and Partners to give back through volunteering and charity fundraising (which can be matched by UWF). Combined, our employees and Partners raised £37,434.32 in FY24, with UWF matching an additional £20,521.32.

Employees once again supported Save the Children's Christmas Jumper Day, and have also volunteered their time to support the Trussell Trust foodbank close to our Colindale Hub in North London, helping to provide emergency food to local families.

As well as directly donating £25,000 to each of our FY24 partner charities (The Wildlife Trusts and FareShare), we donated £54,000 to local charities in and around Colindale, Selkirk and Burnley, asked our six Belonging Groups to nominate charities related to their purpose to receive a share of £12,000, asked our employees and Partners to nominate charities close to their heart to receive a share of £5,000, and donated a total of £21,200 to other good causes, such as the Fuelbank Foundation. The total amount donated by the UWF for FY24 was £162,721.32.

Charitable organisations we supported

£28,393
Donated to The Wildlife Trusts to support nature in the UK

£20,000
Donated to the Fuel Bank Foundation enabling the support of households in fuel poverty

£20,000
Donated to the Trussell Trust's Colindale Foodbank, supporting the distribution of emergency food parcels

£27,450
Donated to FareShare, helping to fight hunger and food waste

UW Foundation continued

Selkirk Hub

We marked the opening of our Selkirk hub by asking our new Selkirk colleagues to choose four local charities to receive a share of an £18,000 donation from the UWF. The selected charities were:

Borders Children's Charity: who provide clothing, shoes, furniture, and specialist equipment to children in desperate situations, and finance treats/holidays for young carers.

The Lavender Touch: who provide complementary therapies to help people in the Scottish Borders who are living with the side effects of cancer and its treatment.

The Borders Carers Centre: who support adult carers in the Scottish Borders by recognising, enabling and sustaining their caring role, as well as supporting having a life outside caring.

Stable Life: who provides a safe, nurturing and learning environment using the horse and its environment to help young people reach their full potential and achieve their aspirations.

Representatives from the charities were invited to attend the opening event and share first-hand the impact the donations would have. The selected charities also received a further donation later in FY24, bringing the total donated by UWF to £26,000. Our colleagues in Selkirk also donated their time to provide additional support through volunteering and fundraising efforts, and intend to continue to do so throughout FY25.

UW Belonging Groups

In support of our newly formed Belonging Groups, UWF committed to donate a total of £12,000 to charities nominated by group members:

- **Menopause Support** chose The Menopause Charity
- **African-Caribbean** group chose Voyage Youth and African Cultural Association
- **Carers network** chose Carers UK
- **Women in Leadership** chose Smartworks
- **Pride** chose Mermaids and LGBT Health and Wellbeing
- **Working Parents** chose Pandas and National Deaf Children's Society

The UWF intends to provide further support to causes that are important to our Belonging Groups throughout FY25.

> **The Selkirk team have loved getting involved in the local community, donating time on two occasions painting the stables over at our local charity partner Stable Life & visiting local supermarkets to bag pack and raise money for excellent causes such as comic relief.**

Stu Burns, Senior Manager
UW Selkirk Hub

1 - GRI content index

This year we have disclosed more information in accordance with GRI. In order to increase transparency we have made some partial disclosures. Over the next year we will continue to improve data collection to enable further meaningful disclosure.

GRI Standard	Disclosure title	Information or identification of where reported
GRI 2: General Disclosures 2021		
1. The organisation and its reporting practices	**Disclosure 2-1 Organisational details**	
	a. report its legal name	Telecom Plus PLC (www.telecomplus.co.uk)
	b. report its nature of ownership and legal form	Telecom Plus PLC is the listed holding company for the Telecom Plus group of companies. Its shares are listed on the London Stock Exchange.
	c. report the location of headquarters	Headquarters in London, UK
	d. report the location of countries of operation	UK based and serves customers in the UK
	Disclosure 2-2 Entities included in the organisation's sustainability reporting	
	a. list all its entities included in its sustainability reporting.	ESG Report - Page 3
	b. if the organisation has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting;	No difference. Annual Report and ESG Report covers Telecom Plus PLC and its subsidiaries.
	c. if the organisation consists of multiple entities, explain the approach used for consolidating the information, including: i. whether the approach involves adjustments to information for minority interests; ii. how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities; iii. whether and how the approach differs across the disclosures in this Standard and across material topics.	Annual Report - Page 117
	Disclosure 2-3 Reporting period, frequency and contact point	
	a. specify the reporting period for, and the frequency of, its sustainability reporting;	01 April 2023 - 31 March 2024. The ESG Report is published annually.
	b. specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this;	01 April 2023 - 31 March 2024. This aligns with the financial reporting period.
	c. report the publication date of the report or reported information;	05 July 2024
	d. specify the contact point for questions about the report or reported information.	shareholders@uw.co.uk

1 - GRI content index continued

Disclosure number	Disclosure title	Where reported
1. The organisation and its reporting practices (continued)	**Disclosure 2-4 Restatements of information**	
	a. report restatements of information made from previous reporting periods and explain: i. the reasons for the restatements; ii. the effect of the restatements.	No restatements have been made.
	Disclosure 2-5 External assurance	
	a. describe its policy and practise for seeking external assurance, including whether and how the highest governance body and senior executives are involved;	Annual Report - Pages 69-70, 99-108
	b. if the organization's sustainability reporting has been externally assured:	GHG emissions statement is verified - Annual Report - page 44
	i) provide a link or reference to the external assurance report(s) or assurance statement(s);	Annual Report - Pages 69-70, 99-108
	ii) describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;	GHG emissions statement is verified - Annual Report - page 44
	iii) describe the relationship between the organization and the assurance provider.	Annual Report - Pages 69-70, 99-108
2. Activities and workers	**Disclosure 2-6 Activities, value chain and other business relationships**	
	a. report the sector(s) in which it is active;	Annual Report Page 2, Pages 9-13 ESG Report Page 5
	b. describe its value chain, including: i. the organisation's activities, products, services, and markets served; ii. the organisation's supply chain; iii. the entities downstream from the organisation and their activities;	Annual Report Page 2, Pages 9-14, 37-40 ESG Report Pages 19-22, 30-31
	Disclosure 2-7 Employees	
	a. report the total number of employees, and a breakdown of this total by gender and by region;	ESG Report Appendix 3 - Disclosure Tables: Social
	b. report the total number of:	ESG Report Appendix 3 - Disclosure Tables: Social
	i) permanent employees, and a breakdown by gender and by region;	ESG Report Appendix 3 - Disclosure Tables: Social
	ii) temporary employees, and a breakdown by gender and by region;	ESG Report Appendix 3 - Disclosure Tables: Social
	iii) non-guaranteed hours employees, and a breakdown by gender and by region;	ESG Report Appendix 3 - Disclosure Tables: Social
	iv) full-time employees, and a breakdown by gender and by region;	ESG Report Appendix 3 - Disclosure Tables: Social
	v) part-time employees, and a breakdown by gender and by region;	ESG Report Appendix 3 - Disclosure Tables: Social

1 - GRI content index continued

GRI Standard	Disclosure title	Information or identification of where reported
2. Activities and workers (continued)	**Disclosure 2-8 Workers who are not employees**	
	a. report the total number of workers who are not employees and whose work is controlled by the organisation and describe: i. the most common types of worker and their contractual relationship with the organisation; ii. the type of work they perform;	ESG Report Appendix 3 - Disclosure Tables: Social
3. Governance	**Disclosure 2-9 Governance structure and composition**	
	a. describe its governance structure, including committees of the highest governance body;	Annual Report Pages 55-65
	b. list the committees of the highest governance body that are responsible for decision- making on and overseeing the management of the organization's impacts on the economy, environment, and people;	Annual Report Page 34
	c. describe the composition of the highest governance body and its committees by: i. executive and non-executive members; ii. independence; iii. tenure of members on the governance body; iv. number of other significant positions and commitments held by each member, and the nature of the commitments; v. gender; vi. under-represented social groups; vii. competencies relevant to the impacts of the organisation; viii. stakeholder representation.	Annual Report Pages 55-65 ESG Report Appendix 3 - Disclosure Tables: Social
	Disclosure 2-10 Nomination and selection of the highest governance body	
	a. describe the nomination and selection processes for the highest governance body and its committees;	Annual Report Pages 61-62, 66-67
	b. describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration: i. views of stakeholders (including shareholders); ii. diversity; iii. independence; iv. competencies relevant to the impacts of the organisation.	Annual Report Pages 61-62, 66-67
	Disclosure 2-11 Chair of the highest governance body	
	a. report whether the chair of the highest governance body is also a senior executive in the organization;	The Chair is a Non-executive Chairman Annual Report Page 55
	b. if the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated.	N/A

1 - GRI content index continued

Disclosure number	Disclosure title	Management approach/where reported
3. Governance (continued)	**Disclosure 2-12 Role of the hightest governance body in overseeing the management of impacts**	
	a. describe the role of the highest governance body and of senior executives in developing, approving, and updating the organisation's purpose, value or mission statements, strategies, policies, and goals related to sustainable development;	Annual Report Page 34, ESG Report Pages 6-8
	b. describe the role of the highest governance body in overseeing the organisation's due diligence and other processes to identify and manage the organisation's impacts on the economy, environment, and people, including: i. whether and how the highest governance body engages with stakeholders to support these processes; ii. how the highest governance body considers the outcomes of these processes;	Annual Report Page 45, ESG Report Pages 7-8
	c. describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review.	ESG Report - Page 6
	Disclosure 2-13 Delegation of responsibility for managing impacts	
	a. describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people, including:	ESG Report - Page 6
	i) whether it has appointed any senior executives with responsibility for the management of impacts;	ESG Report - Page 6
	ii) whether it has delegated responsibility for the management of impacts to other employees;	ESG Report - Page 6
	b. describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people.	ESG Report - Page 6

1 - GRI content index continued

Disclosure number	Disclosure title	Management approach/where reported
3. Governance (continued)	**Disclosure 2-14 Role of the highest governance body in sustainability reporting**	
	a. report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information;	Our ESG Report is reviewed and approved by our Co-CEO before publication
	b. if the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this.	N/A
	Disclosure 2-15 Conflicts of interest	
	a. describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated;	Annual Report Pages 59-61
	Disclosure 2-16 Communication of critical concerns	
	a. describe whether and how critical concerns are communicated to the highest governance body;	Annual Report Page 21 ESG Report Appendix 3 - Disclosure Tables: Governance
	Disclosure 2-18 Evaluation of the performance of the highest governance body	
	a. describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people;	Annual Report - Pages 59-62
	b. report whether the evaluations are independent or not, and the frequency of the evaluations;	Annual Report - Pages 59-62
	c. describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organisational practices.	Annual Report - Pages 59-62
	Disclosure 2-19 Remuneration policies	
	The organisation shall: Describe the remuneration policies for members of the highest governance body and senior executives, including: i. fixed pay and variable pay; ii. sign-on bonuses or recruitment incentive payments; iii. termination payments; iv. clawbacks; v. retirement benefits	Annual Report - Pages 71-92

1 - GRI content index continued

Disclosure number	Disclosure title	Management approach/where reported
3. Governance (continued)	**Disclosure 2-20 Process to determine remuneration**	
	a. describe the process for designing its remuneration policies and for determining remuneration, including: i) whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration; ii) how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration; iii) whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives;	Annual Report - Pages 71-73
	b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable.	Annual Report - Page 92
	Disclosure 2-21 Annual total compensation ratio	
	Report the ratio of the annual total compensation for the organisation's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);	Annual Report - Page 91
4. Strategy, policies and practices	**Disclosure 2-22 Statement on sustainable development strategy**	
	a. report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development.	ESG Report - Page 2

1 - GRI content index continued

Disclosure number	Disclosure title	Management approach/where reported
4. Strategy, policies and practices (continued)	**Disclosure 2-23 Policy commitments**	
	a. describe its policy commitments for responsible business conduct, including: i. the authoritative intergovernmental instruments that the commitments reference; ii. whether the commitments stipulate conducting due diligence; iii. whether the commitments stipulate applying the precautionary principle; iv. whether the commitments stipulate respecting human rights;	Annual Report - Page 41, ESG Report - Page 33, 35 Human Rights Policy Supply Chain Policy Supplier Code of Conduct Modern Slavery Statement Diversity and Inclusion Summary Health, Safety and Wellbeing Policy Statement Environmental Policy Anti-Bribery and Corruption Policy Whistleblowing Policy Human Rights Policy Modern Slavery Statement
	b. describe its specific policy commitment to respect human rights, including: i. the internationally recognised human rights that the commitment covers; ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organisation gives particular attention to in the commitment;	
	c. provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this;	
	d. report the level at which each of the policy commitments was approved within the organisation, including whether this is the most senior level;	
	e. report the extent to which the policy commitments apply to the organisation's activities and to its business relationships;	
	f. describe how the policy commitments are communicated to workers, business partners, and other relevant parties.	
	Disclosure 2-24 Embedding policy commitments	
	describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships, including:	Annual Report - Page 40-41, ESG Report - Pages 6 and 33 - 35
	i) how it allocates responsibility to implement the commitments across different levels within the organization;	Annual Report - Page 40-41, ESG Report - Pages 6 and 33 - 35
	ii) how it integrates the commitments into organizational strategies, operational policies, and operational procedures;	Annual Report - Page 40-41, ESG Report - Pages 6 and 33 - 35
	iii) how it implements its commitments with and through its business relationships;	Annual Report - Page 40-41, ESG Report - Pages 6 and 33 - 35
	iv) training that the organization provides on implementing the commitments.	Annual Report - Page 40-41, ESG Report - Pages 6 and 33 - 35

1 - GRI content index continued

Disclosure number	Disclosure title	Management approach/where reported
4. Strategy, policies and practices (continued)	**Disclosure 2-25 Processes to remediate negative impacts**	
	a. describe its commitments to provide for or cooperate in the remediation of negative impacts that the organisation identifies it has caused or contributed to;	ESG Report - Page 9
	b. describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in;	Internal Grievance Policy Whistleblowing Policy
	c. describe other processes by which the organisation provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to	ESG Report - Page 10-13
	Disclosure 2-26 Mechanisms for seeking advice and raising concerns	
	a. describe the mechanisms for individuals to:	
	i) seek advice on implementing the organization's policies and practices for responsible business conduct;	Through company policies including the Anti-Bribery and Corruption Policy
	ii) raise concerns about the organization's business conduct.	Internal Grievance Policy Whistleblowing Policy
	Disclosure 2-28 Membership associations	
	a. report industry associations, other membership associations, and national or international advocacy organizations in which it participates in a significant role.	Trade body membership of UKCTA Energy UK, Cornwall Insight, Collaboration Network
5. Stakeholder engagement	**Disclosure 2-29 Approach to stakeholder engagement**	
	The organisation shall: a. describe its approach to engaging with stakeholders, including: i. the categories of stakeholders it engages with, and how they are identified; ii. the purpose of the stakeholder engagement; iii. how the organisation seeks to ensure meaningful engagement with stakeholders.	Annual Report - Page 45
	Disclosure 2-30 Collective bargaining agreements	
	The organisation shall: Report the percentage of total employees covered by collective bargaining agreements	ESG Report Disclosure Tables: Social

1 - GRI content index continued

Material Topics		
	Disclosure 3-1 Process to determine material topics	
	a. describe the process it has followed to determine its material topics, including: i. how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships; ii. how it has prioritised the impacts for reporting based on their significance;	ESG Report - page 8
	b. specify the stakeholders and experts whose views have informed the process of determining its material topics.	ESG Report - page 8
	Disclosure 3-2 List of material topics	
	a. List its material topics;	ESG Report - page 8
	b. report changes to the list of material topics compared to the previous reporting period.	No change to previous reporting period
	Disclosure 3-3 Management of material topics	
	For each material topic reported under Disclosure 3-2, the organisation shall: a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights	ESG Report - pages 9-37
	b. report whether the organisation is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships	ESG Report - pages 9-37
	c. describe its policies or commitments regarding the material topic	ESG Report - pages 9-37
	d. describe actions taken to manage the topic and related impacts, including: i. actions to prevent or mitigate potential negative impacts; ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii. actions to manage actual and potential positive impacts.	ESG Report - page 9-37
	e. report the following information about tracking the effectiveness of the actions taken: i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organisation's operational policies and procedures	ESG Report Pages 6, 9, 10, 19, 24, 33
	f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)	ESG Report - pages 7-8

1 - GRI content index continued

Material Topics		
Anti-Corruption		
GRI 205: Anti-corruption 2016	GRI 205-01 Operations assessed for risks related to corruption.	ESG Report Disclosure Tables: Governance
	GRI 205-02 Communication and training about anti-corruption policies and procedures	ESG Report Appendix 3 - Disclosure Tables: Governance
	205-03 Confirmed incidents of corruption and actions taken	ESG Report Appendix 3 - Disclosure Tables: Governance
Energy		
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Annual Report - Pages 43-44, ESG Report Appendix 3 - Disclosure Tables: Environment
	302-3 Energy intensity	Annual Report - Pages 43, ESG Report Appendix 3 - Disclosure Tables: Environment
	302-4 Reduction of energy consumption	Annual Report - Pages 43-44, ESG Report Page 11-12 ESG Report Appendix 3 - Disclosure Tables: Environment
Emissions		
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Annual Report - Pages 43-44, ESG Report Appendix 3 - Disclosure Tables: Environment
	305-2 Energy indirect (Scope 2) GHG emissions	Annual Report - Pages 43-44, ESG Report Appendix 3 - Disclosure Tables: Environment
	305-3 Other indirect (Scope 3) GHG emissions	Annual Report - Pages 43-44, ESG Report Appendix 3 - Disclosure Tables: Environment
	305-4 GHG emissions intensity	Annual Report - Pages 43-44, ESG Report Appendix 3 - Disclosure Tables: Environment
	305-5 Reduction of GHG emissions	Annual Report - Pages 43-44, ESG Report Pages 11-12 ESG Report Appendix 3 - Disclosure Tables: Environment

1 - GRI content index continued

Material Topics		
Employment		
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	ESG Report Appendix 3 - Disclosure Tables: Social
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	ESG Report Appendix 3 - Disclosure Tables: Social
	401-3 Parental leave	ESG Report Appendix 3 - Disclosure Tables: Social
Training and Education		
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	Annual Report - Pages 30-31, ESG Report Page 26 ESG Report Appendix 3 - Disclosure Tables: Environment
Diversity and Equal Opportunities		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Annual Report - Page 62 ESG Report Appendix 3 - Disclosure Tables: Environment
	405-2 Ratio of basic salary and remuneration of women to men	Gender Pay Gap Report
Non-discrimination		
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	ESG Report Appendix 3 - Disclosure Tables: Social
Marketing and Labelling		
GRI 417: Marketing and Labelling 2016	417-3 Incidents of non-compliance concerning marketing communications	ESG Report Appendix 3 - Disclosure Tables: Social
Customer Privacy		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	ESG Report Appendix 3 - Disclosure Tables: Social

2 - Management Approach Tables

Material Topic	Topic definition	GRI reference	Boundary, aim and management approach
1. Governance, business ethics & transparency	Robust and responsible corporate leadership relating to business ethics, regulatory compliance, risk management, transparency in reporting and financial disclosures	GRI 205: Anti corruption	This topic impacts on all our internal and external stakeholders (customers, employees, Partners, investors, suppliers and local communities). This topic is managed by having in place the right governance, accountability in decision making and transparent reporting. The aim is to ensure fair treatment of all our stakeholders and ethical behaviour in the marketplace. Relevant policies are: Anti-bribery & Corruption Policy; Human Rights Policy; Supply Chain Policy; Modern Slavery Statement; Supply Chain Policy; Supplier Code of Conduct; Partner Code of Conduct, and Whistleblowing Policy.
2. Inspiring, developing & supporting our people	Promoting a positive company culture, providing employee training and skills development, ensuring employee engagement, and promoting the physical and mental health and wellbeing of our colleagues	GRI 404: Training and education	This topic impacts our employees and our self-employed Partners. The topic is managed through director level responsibility and business-wide policies and practices. For our employees this is driven by our People & Culture strategy. For our self-employed Partners we make a range of training, tools, and resources available to them through our Partner portal. The aim is to enhance the positive impact for our employees and enable us to attract, develop and keep talent. We also aim to support our self-employed Partners to develop themselves. Relevant employee policies include: Flexible Working Policy, Diversity, Inclusion and Belonging Policy, Grievance Policy, Staff Handbook; and Whistleblowing Policy. Relevant Partner policies include: Guidelines for UW Partners, The Opportunity; and the Partner portal (which includes updates, toolkits and training to support development).
3. Reducing greenhouse gas emissions	Reducing GHG emissions from the products and energy that UW sells to customers and uses in their own offices by reducing fossil fuel-based energy and offering low carbon home solutions to customers	GRI 305: Emissions	This topic impacts on our Scope 1, 2 and 3 GHG emissions. This topic is managed through the ESG Steering Committee and Working Group. Our GHG emissions are measured and managed by the Head of Sustainability. The aim is to support in working towards a more sustainable low carbon future. Our target is to be a net zero business by 2050. Our net zero transition plan is outlined on pages 11-13 of this report. Our management approach to climate risk is further outlined in our TCFD disclosures within our Annual Report and Accounts.

2 - Management Approach Tables continued

Material Topic	Topic definition	GRI reference	Boundary, aim and management approach
4. Energy efficiency advice	Providing customers with energy saving advice and information to enable them to reduce their energy usage	GRI 302: Energy consumption	This topic impacts the advice we offer our customers on how to use energy efficiently at home. This topic is managed through director level responsibility with regard to the services we offer our customers. The services offered to help reduce customer emissions (e.g. smart meter installation and energy efficiency advice) is monitored by the ESG Strategy Committee. The aim is to enable customers to understand and manage their home energy use. Further information is available on pages 20 of this report.
5. Protecting vulnerable customers	Protecting and supporting vulnerable customers	No GRI reference	This topic impacts our vulnerable customers. The increased cost of living is affecting us all but it is felt more acutely by our customers who are vulnerable and as a result we are focusing our efforts on continuing to support these customers. This topic is managed through our internal Ability to Pay team and through our partnership with Citizens Advice Plymouth. The Chief Operating Officer has been nominated as Executive Vulnerability Sponsor. Our programs and targets to support vulnerable customers are further outlined on page 21 of this report.
6. Cybersecurity	Application of technologies, processes, and controls to protect systems, networks, programs, devices and data from cyber attacks	GRI 418: Customer privacy	This topic covers anything that might compromise the security of our network, data, and technology. This topic is managed through Director level responsibilities. We have robust information security and data privacy policies maintained and governed by our Security Operations Center and Data Privacy teams. All our staff are provided with security and privacy training, and our call centre agents are provided with additional training on how to deal with customer related security issues. The aim is to ensure that we protect our business from disruption from cybersecurity threats and that we protect our customers' data, privacy and online safety. Our approach to cyber and data security is further outlined on pages 19 -20 of this report. Relevant policies our include Privacy Policy; Data Protection Policy; Retention Policy; Retention Matrix; Record Management Policy; Customer Privacy Policy; Partner Privacy Policy; Job Applicant Privacy Policy; Cookies Policy; and Staff Privacy Notice. We also have a Stay Safe Online area on our website, which provides customers with advice and raises awareness of scams and fraud.

2 - Management Approach Tables continued

Material Topic	Topic definition	GRI reference	Boundary, aim and management approach
7. Business resilience & continuity of supply	Ensuring robust systems, processes and procedures are in place to manage any service disruption and ensure business continuity	No GRI reference	This topic impacts on the supply of all our services to our customers, and indirectly on our employees and self-employed Partners. This topic is managed through director level responsibility and engagement with our wholesale suppliers on services and conditions of supply. We proactively engage with the government and with regulators to advocate for a fair and transparent approach that focuses on long term stability. The aim is to ensure a continuous supply of services to our customers, and to ensure a stable energy market in the medium and long term.
8. Positive economic impact on communities	Providing employment and flexible earning opportunities to support colleagues and Partners respectively	GRI 401: Employment	This topic impacts on our employees, self-employed Partners and local communities. This topic is managed through Director level involvement. The aim is to provide employment opportunities to our employees and offer people from all walks of life the ability to earn an additional income through the UW Partner opportunity. Relevant policies include our Staff Handbook and the Partner Opportunity.
9. Human rights & supply chain management	Monitoring and ensuring the safety, wellbeing and respect for workers' rights in our own operations (e.g. employees, contractors) and in our supply chain	GRI 2: General disclosures 2-23: Policy commitments 2-24: Embedding policy commitments 2-25: Processes to remediate negative impacts 2-26: Mechanisms for seeking advice and raising concerns	This topic impacts on all our internal and external stakeholders (customers, employees, Partners, investors, suppliers and local communities). This topic is managed by having in place the right governance, accountability in decision making, and transparent reporting. Modern Slavery, Anti Bribery and Corruption, Data Protection and Information Security training are available to our employees on our new learning and development platform, Spark. The aim is to protect human rights to ensure fair treatment of all our stakeholders and to ensure ethical behaviour in the marketplace. Relevant policies are our: Anti-bribery & Corruption Policy, Human Rights Policy, Modern Slavery Statement, Supply Chain Policy, Supplier Code of Conduct, Staff Handbook, Partner Code of Conduct, and Whistleblowing Policy.

2 - Management Approach Tables continued

Material Topic	Topic definition	GRI reference	Boundary, aim and management approach
10. Responsible sales and marketing	Ensuring that marketing communications and creative content are clear, fair, inclusive and respectful and all customer product and marketing materials are accurate, transparent and not misleading	GRI 417: Marketing and labelling	This topic impacts our customers. The aim of our approach is to continue to deliver a trusted and reliable service for our customers. We continue to adhere to responsible sales and marketing practices by ensuring our advertising and promotional material is clear, unambiguous, accessible, accurate and fair. Our Legal & Compliance team provides training to our Marketing team. We have marketing and advertising guidance which covers consumer law requirements and the CAP Code. We have a dedicated marketing inbox through which the Marketing team can raise queries to our Legal and Compliance team. Our Partners are key to our word of route to market All Partners are required to adhere to our Partner Guidelines and our Partner Code of Conduct which set our requirements and the standards we expect our Partners to maintain. More information can be found in the “Responsible business” section of this report.
11. Diversity & Inclusion	Creating a culture where diversity, of thought, background and approach, is proactively sought out and valued	GRI 405: Diversity and inclusion GRI 406: Non-discrimination	This topic impacts our employees. As an employer of over 2500 people, promoting diversity and inclusion is very important to our business. This topic is managed through our Director of People & Culture with input from our Belonging Groups (who meet on a regular basis and have representatives from across UW). Relevant policies include: Parental Leave Policy, Adoption Leave and Pay Policy, Flexible Working Policy and Becoming a Parent Policy, Diversity, Inclusion & Belonging Policy.
12. UW Foundation Governance			The UW Foundation (UWF) was set up in 2019 and aims to have a positive impact on the environment, disadvantaged groups and other organisations that exist for public benefit and can demonstrate their charitable purpose. The UW Foundation is administered by the Charities Trust (Charity Registration number: 327489) who ensure payments are made appropriately and any legal requirements are fulfilled. We have a UW Foundation Board and Committee. The Board is made up of representatives of UW, including Andrew Lindsay Co-CEO, Beatrice Hollond, Non-Executive Director, Telecom Plus PLC, Sheryl Jermyn, Legal & Compliance Director, as well as Charities Trust representatives. The UWF Board meets at least annually to discuss the performance of the UWF and set any new goals or objectives for the next financial year. Membership of the UWF Committee spans employees from across UW. They ensure the Foundation’s day to day work is carried out, and encourage employee and Partner engagement.

3 - Disclosure Tables: Environment

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21
Emissions from activities for which the company own or control including combustion of fuel and operation of facilities tCO2e (Scope 1)	tCO2e	GRI 305-1	80.03	84.34	1757.19	1742.00
Emissions from purchase of electricity, heat, steam and cooling purchased for own use tCO2e (Scope 2, location-based methodology)	tCO2e	GRI 305-2	683.52	746.43	1085.30	1138.00
Emissions from purchase of electricity, heat, steam and cooling purchased for own use tCO2e (Scope 2, market-based methodology)	tCO2e	GRI 305-2	26.71	29.92	1085.30	1138.00
Total gross Scope 1 and Scope 2 emissions tCO2e (all) Scope 2, (location-based methodology)	tCO2e	GRI 305-1 GRI 305-2	763.55	830.78	2842.49	2880.00
Total gross Scope 1 and Scope 2 emissions tCO2e (all) Scope 2, (Scope 2 market-based methodology)	tCO2e	GRI 305-1 GRI 305-2	106.74	114.27	2842.49	2880.00
Energy consumption used to calculate above emissions (kWh)	kWh	GRI 302-1	3,667,478.39	4,254,146.65	11,489,878.48	11,496,817.00
Gas (kWh)	kWh	GRI 302-1	308,058.28	268,515.88	275,431.50	195,008.50
Electricity (kWh)	kWh	GRI 302-1	3,300,851.80	3,859,933.09	5,112,892.77	4,882,710.00
Transport fuels (kWh)	kWh	GRI 302-1	58,568.31	125,697.68	6,101,554.21	6,419,099
Energy consumption by unit turnover/revenue (kWh/£M)	kWh/£M	GRI 305-4	1,800.17	1,718.85	11,877.07	13,349.76
Total gross Scope 1 and Scope 2 emissions by unit turnover/revenue (tCO2e/£M) (Scope 2 location-based methodology)	tCO2e/£M	GRI 305-4	0.37	0.34	0.37	3.34
Total gross Scope 1 and Scope 2 emissions by unit turnover/revenue (tCO2e/£M) (Scope 2 market-based methodology)	tCO2e/£M	GRI 305-4	0.05	0.05	2.94	3.34
Methodology	Narrative	GRI 305-1 GRI 305-2	GHG Protocol & ISO14064 Part 1 2018 and Carbon Reduce	GHG Protocol & ISO14064 Part 1 2018 and Carbon Reduce	GHG Protocol & ISO14064 Part 1 2018 and Carbon Reduce	GHG Protcol
Emissions from other activities tCO2e (Scope 3)	tC02e	GRI 305-3	2,574,650.11	2,297,222.12	2,199,053.72	1,725,129
Total gross Scope 3 emissions tCO2e	tC02e	GRI 305-3	2,574,650.11	2,297,222.12	2,199,053.72	1,725,129
Total gross Scope 1, Scope 2 and Scope 3 emissions tCO2e (Scope 2 location-based methodology)	tC02e	GRI 305-1	2,575,413.66	2,298,052.90	2,575,413.66	1,728,009

3 - Disclosure Tables: Environment continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21
Total gross Scope 1, Scope 2 and Scope 3 emissions tCO2e (Scope 2 market-based methodology)	tC02e	GRI 305-1	2,574,756.85	2,297,336.39	2,201,896.21	1,728,009
Total gross GHG emissions per unit turnover/revenue (tCO2e/£M) (Scope 2 location-based methodology)	tC02e	GRI 305-1	1,264.13	928.00	2,276.10	2,006.51
Total gross GHG emissions per unit turnover/revenue (tCO2e/£M) (Scope 2 market-based methodology)	tC02e	GRI 305-4	1,263.81	928.16	2,276.10	2,007.00
Third-party verification	Narrative		Verified to ISO14064 Part 1 2018 and Carbon Reduce	Verified to ISO14064 Part 1 2018 and Carbon Reduce	Verified to ISO14064 Part 1 2018 and Carbon Reduce	Data not third party verified.
Water and effluents						
(1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	Thousand cubic meters (m^3)	GRI 303-3	6,625	12,074	17,006	17,006

This statement has been prepared and verified (to limited assurance) in accordance with the requirements of the measure-step of the Toitū carbon marks, which is based on the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) and ISO 14064 Part 1 2018 Specification with Guidance at the Organization Level for Quantification and Reporting of Greenhouse Gas Emissions and Removals. It meets the requirements of the Streamlined Energy & Carbon Report framework.

Our GHG reporting year is the same as our financial year. We use the operational control methodology.

Our reporting covers: our UK-based Scope 1 (direct emissions from our own operation); Scope 2 (indirect emissions from the generation of purchased energy) which is calculated following location and market based methodology; and Scope 3 emission sources, covering the following GHG protocol categories: purchased goods and services, fuel and energy related activities, waste generated in operations, leased assets, use of sold products, and business travel.

We use the Location-based method for Scope 2 emissions accounting – as defined in the Scope 2 Guidance amendment to the Corporate Standard (ghgprotocol.org) and the Market-based method for Scope 2 emissions accounting – as defined in the Scope 2 Guidance amendment to the Corporate Standard (ghgprotocol.org).

We restate historical years' data when we think subsequent information is materially significant (e.g. replacing estimates with measured figures). This year we have not had to restate any historical years data. The data reflects the sale of UW's 75% shareholding in Glow Green Limited which was completed on 31 July 2022.

3 - Disclosure Tables: Social

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Total number of permanent employees	Number	GRI 2-7, WDI 3.3	2,499	2,352	1,553	1,444	
Gender split of permanent employee base (Female/Male/Prefer not to say)	%	GRI 2-7, WDI 3.4	M 52.86% F 47.14%	M 54% F 46%	M 55% F 45%	M 58% F 42%	
Total number of temporary employees	Number	GRI 2-7, WDI 3.3	15	22	10	14	
Gender split of temporary employees (Female/Male/Prefer not to say)	%	GRI 2-7, WDI 3.4	M 40% F 60%	M 32% F 68%	M 30% F 70%	M 57% F 43%	
Total number of non-guaranteed hours employees	Number	GRI 2-7, WDI 3.3	0				
Gender split of non-guaranteed hours employees	%	GRI 2-7, WDI 3.4	N/A				
Total number of full-time employees	Number	GRI 2-7, WDI 3.3	2116	1987	1278	1214	
Gender split of full-time employee base (Female/Male/Prefer not to say)	%	GRI 2-7, WDI 3.4	M 56.95% F 43.05%	M 58% F 42%	M 60% F 40%	M 63% F 37%	
Total number of part-time employees	Number	GRI 2-7, WDI 3.3	398	387	285	244	
Gender split of part-time employees (Female/Male/Prefer not to say)	%	GRI 2-7, WDI 3.4	M 30.65% F 69.35%	M 32% F 68%	M 29% F 71%	M 28% F 72%	
Describe the methodologies and assumptions used to compile the data, including whether the numbers are reported are FTE or use another methodology and whether the numbers reported are at the end of the reporting period, as an average across the reporting period or use another methodology.	Narrative	GRI 2-7	The data is reported by the number of employees in each of the above categories and has been taken at the end of the reporting period.				
Describe significant fluctuations in the number of employees during the reporting period and between reporting periods.	Narrative	GRI 2-7	No significant fluctuation in the number of employees during reporting periods.	Number of employees has increased due to a rapid growth acceleration in the reporting period.			

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Provide the total number and/or percentage (%) of the company's non-employee direct operations workers as a proportion of the total direct operations workforce	%	GRI 2-8, WDI 3.5	232 9.28%	Not reported	Not reported	Not reported	This disclosure covers all individuals without a permanent employment contract with Telecom Plus. This includes; contractors, agency workers, recruitment agency workers, third party on-site workers
Has the proportion of workers on contingent contracts (i.e. fixed-term/temporary employees, contractors, agency workers and/or third-party on site workers) increased or decreased substantively over the last reporting period?	Yes/No	WDI 3.8	Yes - decreased				
Total number of new hires in the reporting period	Number	GRI 401-1	586	1106	750	490	
Age split of new hires (under 30 yrs/ 30-50yrs/over 50)	%	GRI 401-1	Under 30: 41.64% 30-50: 53.07% Over 50: 5.29%	Under 30: 44%: 30-50: 50% Over 50: 6%			
Gender split of new hires (Female/Male/Prefer not to say)	%	GRI 401-1	M 51.54% F 48.46%	M 53% F 47%			
Employee turnover - by age (under 30 yrs/30-50yrs/over 50)	%	GRI 401-1	Under 30: 47.67% 30-50: 45.60% Over 50: 6.74%	Under 30: 41% 30-50: 52% Over 50: 7%			
Employee turnover rates - by gender	%	WDI 6.1	M 57.51% F 42.49%				
Describe how the company's turnover rate has changed significantly since the last reporting period and explain any increase or decrease for any particular category of workers. If turnover has remained stable, state this.	Narrative	WDI 6.3	Employee turnover decreased in FY24 by 11.97%				
Provide the CEO to median worker pay ratio.	Ratio	WDI 5.1	94.89:1				

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Provide the percentage (%) of employees in the bottom, lower middle, upper middle, and upper pay quartiles by gender.	%	WDI 5.5	Lower quartile: Male 53%/Female 47% Lower Middle: Male 48%/Female 52% Upper Middle: Male 56%/Female 44% Upper: Male 66%/Female 34%				
What is the percentage (%) of employees, as a total of the direct operations workforce, whose basic salary is equal to or up to 10 per cent higher than the legal minimum wage, split by gender?	%	WDI 5.6	M 7.81% F 12.05%				Note: international employees who make up 2.48% of the direct operations workforce have been excluded from this data. Minimum wage thresholds based on: https://www.gov.uk/national-minimum-wage-rates for Apr 23 - Mar 24 and age categories.
To what extent does the company pay its employees a living wage or above? Select one option from the drop-down list as applicable.	Narrative	WDI 5.7	Not in any direct locations				

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Describe benefits that are standard for full-time employees, to include as a minimum: Life insurance, health care, disability and invalidity coverage, parental leave, retirement provision, stock ownership, any others.	Narrative	GRI 401-2	All UW employees are entitled to access a number of benefits as long as they meet the full eligibility criteria: Company Funded Benefits: Life Assurance 4x Salary (including a virtual GP service) Discounted UW services (for employees choosing to be a UW customer) Employee Assistance Programme including Counselling sessions. Mental Health and Wellbeing platform, Financial wellbeing platform Employee Recruitment Referral Scheme Save as you Earn Employee Share Options. Discounted employee-funded benefits: Enhanced life assurance (e.g. 6 or 8x salary) Partner life assurance Private medical insurance, Critical Illness cover, Health assessments, Healtcare cash plan, Dental insurance, Cycle to Work, Green car salary sacrifice scheme, and payroll giving. There are also a number of employee policies that provide for parental leave, carers leave and flexibility for our employees.				

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Protection during sick leave. What measures does the company have in place to ensure that workers who are unwell take sick leave, and other necessary leave, and are protected economically if they need to do so?	Narrative	WDI 8.12	We have a 'Supporting your attendance at work' policy which outlines our approach to supporting colleagues who are unwell or have ongoing health conditions. Measures include: provision of up to one months full sick pay in scenarios where employees need to take time away from work to recover from an ill health scenario, working with an occupational health provider to identify reasonable adjustments, and health and wellbeing meetings with employees.				
Workers protected during sick leave	Narrative	WDI 8.13	Indefinite/permanent employees Fixed term/temporary employees	Indefinite/ permanent employees Fixed term/ temporary employees			
Total number of employees that returned to work in the reporting period after parental leave ended by gender	No. female/ No. male	GRI 401-3	M 35 F 39	M 34 F 25			Data includes anyone who returned from one of the following parental leave types: paternity, maternity, adoption and shared in FY24. Please note they may have started their parental leave in the previous reporting period.
Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work by gender	No. female/ No. male	GRI 401-3	M 33 F 21	M 27 F 17			Figures reflect employees that returned from parental leave in FY23 and were still employed 12 months after their return in FY24.

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Return to work and retention rates of employees that took parental leave by gender	% female/ % male	GRI 401-3	Return to work rate: M 100% F 78.13% Retention rate: M 97.06% F 84%	RTW Rate: M 100% F 84% Retention Rate: M 77% F 81%			
Training & education							
Type and scope of programs for upgrading employees skills implemented and assistance provided to upgrade employee skills	Narrative	GRI 404-2	See Page 26 ESG report				
Diversity & equal opportunities							
Percentage of individuals within the organisation's governance bodies in each of the following diversity categories: Gender Age group: under 30 yrs old, 30-50 yrs old, over 50 yrs old Other indicators of diversity where relevant (such as minority or vulnerable groups)	%	GRI 405-1	Board M 62.5% F 37.5% Under 30: 0 30-50: 25% Over 50: 75%	Board M 62.5% F 37.5% Under 30: 0 30-50: 25% Over 50: 75%	Data not available	Data not available	

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Percentage of employees per employee category (Board, Director, Manager, Team Leader, General Staff) in each of the following diversity categories: Gender Age group: under 30 yrs old, 30-50 yrs old, over 50 yrs old Other indicators of diversity where relevant (such as minority or vulnerable groups)	%	GRI 405-1, WDI 4.5,	Board: M 62.5% F 37.5% Under 30: 0% 30-50: 25% Over 50: 75% Director: M 76% F 24% Under 30: 0% 30-50: 64% Over 50: 36% Manager: M 54.19% F 45.81% Under 30: 8.39% 30-50: 76.77% Over 50: 14.84% Team Leader: M 52.26% F 47.74% Under 30: 13.57% 30-50: 72.36% Over 50: 14.07% General Staff: M 52.32% F 47.68% Under 30: 29.19% 30-50: 57.22% Over 50: 13.59%	Board: M 62.5% F 37.5% Under 30: 0% 30-50: 25% Over 50: 75% Director: M 80% F 20% Under 30: 0% 30-50: 52% Over 50: 48% Manager: M 54% F 46% Under 30: 9% 30-50: 78% Over 50: 14% Team Leader: M 59% F 41% Under 30: 14% 30-50: 76% Over 50: 10% General Staff: M 53% F 47% Under 30: 33% 30-50: 55% Over 50: 12%	Data not available	Data not available	
Percentage of management roles held by females (Target 40% by FY25)	%	UW target	46%	46%	Data not available	Data not available	Data includes anyone in job classification 2 (manager) who is female. This includes individuals who are people managers with direct reports and managers without direct reports.

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Percentage of management roles held by ethnically diverse employees (Target 30% by FY 25)	%	UW target	34%	31%	Data not available	Data not available	Figure includes all ethnic groups in job classification 2 excluding White - British and White Irish. Please note 12.47% of managers have not disclosed their ethnicity. Job classification 2 includes individuals who are people managers with direct reports and managers without direct reports.
Number of board members	Number	FCA listing rules	8	8	Data not available	Data not available	
Number and % of board members who are male	Number & %	FCA listing rules	5 62.5%	5 62.5%	Data not available	Data not available	
Number and % of board members who are female	Number & %	FCA listing rules	3 37.5%	3 37.5%	Data not available	Data not available	
Number of Senior Board positions who are female (Chair, Chief Executive Officer, Senior Independent Director or Chief Financial Officer) (Target = 1)	Number	FCA listing rules	1	1	Data not available	Data not available	
Number of board members from a minority ethnic background (Target = 1)	Number	FCA listing rules	0	0	Data not available	Data not available	
Number and % of board members who are British white or other white	Number & %	FCA listing rules	8 100%	8 100%	Data not available	Data not available	
Number and % of board members who are mixed/ multiple ethnic groups	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number and % of board members who are Asian/ Asian British	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number and % of board members who are Black/ African/Caribbean/Black British	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number and % of board members who are other ethnic group including Arab	Number & %	FCA listing rules	0	0	Data not available	Data not available	

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Number and % of board members who don't specify/prefer not to say	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number of members of the executive management team	Number	FCA listing rules	12	11	Data not available	Data not available	
Number and % of executive management team who are male	Number & %	FCA listing rules	9 75%	9 82%	Data not available	Data not available	
Number and % of executive management team who are female	Number & %	FCA listing rules	3 25%	2 18%	Data not available	Data not available	
Number and % of executive team who are British white or other white	Number & %	FCA listing rules	11 91.67%	9 82%	Data not available	Data not available	
Number and % of executive team who are mixed/ multiple ethnic groups	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number and % of executive team who are Asian/ Asian British	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number and % of executive team who are Black/ African/Caribbean/Black British	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number and % of executive team who are other ethnic group including Arab	Number & %	FCA listing rules	0	0	Data not available	Data not available	
Number and % of executive team who don't specify/prefer not to say	Number & %	FCA listing rules	1 8.33%	2 18%	Data not available	Data not available	
Ratio of the basic salary and remuneration of women to men for each employee category by significant locations of operation.	Ratio	GRI 405-2, WDI 5.2	See Gender Pay Gap Report	See Gender Pay Gap Report	See Gender Pay Gap Report	See Gender Pay Gap Report	
Incidents of discrimination and corrective actions taken a. Total number of incidents of discrimination during the reporting period	Number	GRI 406-1	8	1	Data not available	Data not available	This disclosure covers all individuals without a permanent employment contract with Telecom Plus. This includes; contractors, agency workers, recruitment agency workers, third party on-site workers

3 - Disclosure Tables: Social continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Incidents of discrimination and corrective actions taken b. Status of the incidents and actions taken with reference to the following: i. Incident reviewed by the organisation ii. Remediation plans being implemented iii. Remediation plans that have been implemented with results reviewed through routine internal management review processes iv. Incident no longer subject to action	Narrative	GRI 406-1	Incidents no longer subject to action	Incidents no longer subject to action	Data not available	Data not available	
Worker voice & representation							
Provide the percentage (%) of employees covered by collective bargaining agreements for all locations in the direct operations	%	WDI 9.2, GRI 407	0				
Provide one example of how workers have influenced decision making on an issue of substance in the reporting period	Narrative	WDI 9.9	Carers Leave Policy - set up of Carers Network, listening to feedback and informing what matters most to our employees as carers alongside our need to create an inclusive environment. This listening /feedback resulted in the proposal and confirmation of 1 weeks paid leave for employees fulfilling caring responsibilities. This goes beyond the legal requirement in the UK. We are continuing to strengthen our Belonging Groups and their influence to help create and change policy and influence decisions at UW				
Provide the number of grievances relating to human rights and/or workers' rights reported and resolved in the reporting period in the company's direct operations and in the company's value chain	Number	WDI 10.4	8 reported 8 resolved			N/A	

3 - Disclosure Tables: Governance

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Communication of critical concerns							
Describe whether and how critical concerns are communicated to the highest governance body	Narrative	GRI 2-16	Any critical concerns are communicated to the TP Board through the monthly Board Report	Information not reported			
Value chain transparency							
Provide the number of first tier suppliers in each of the company's top ten sourcing locations (determined by percentage of overall procurement/spend)	Narrative	WDI 11.4	Country: No. of suppliers UK: 974 USA: 53 Netherlands: 5 Gibraltar: 1 Ireland: 7 Spain: 11 Germany: 3 Mexico: 1 Canada: 4 Poland: 3				
How does the company assess whether its sourcing and/or purchasing practices allow a supplier to meet its workers' rights commitments e.g. by requesting feedback on the business relationship from suppliers etc?	Narrative	WDI 12.5	We have systems and processes in place to ensure robust and responsible supply chain management and remain committed to future-proofing our supply chain management as our business scales. We have embedded responsible supply chain management across our business through our Supply Chain policy. In addition, new suppliers and existing suppliers at contractual renewal are sent our Supplier Code of Conduct. This Code of Conduct sets out the standards we expect our suppliers to adhere to including compliance with laws and regulation, respecting human rights, a zero tolerance approach to bribery and corruption, robust security and privacy measures, and good environmental stewardship. As part of our contract management process for new suppliers we conduct due diligence which includes questions on business continuity, climate change plans, and security measures.				

3 - Disclosure Tables: Governance continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Human rights due diligence							
Does the company conduct regular human rights due diligence to identify, prevent, mitigate and account for human rights risks and adverse impacts?	Narrative	WDI 2.1	Yes We are is committed to respecting everyone's human rights in all aspects of our operations. Whilst we work 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. Our commitment to operating with respect to human rights is reflected in our company policies, procedures and due diligence. Key policies can be found at https://telecomplus.co.uk/legal/corporate-information. In FY24 we reviewed all material suppliers (accounting for 99% of our spend in the relevant period) to identify any areas of potential Human Rights risks within our supply chain using a review methodology that referenced the OECD Due Diligence Guidance for Responsible Business Conduct. We screened all material suppliers against country risk indices (based on the Foreign, Commonwealth and Development Office's (FCDO) Human Rights Priority Countries (HRPCs) and EIRIS High Risk Countries for Human Rights and the TRACE Bribery Risk Matrix 2023) and sector risk indices (based on the United Nations Global Compact Business and Human Rights Navigator). Desk research was undertaken on material suppliers who are in a country, or operating in a sector, that we identified as having a higher risk of human rights, modern slavery, sanctions, and anti-bribery and corruption risk. High risk sectors include resource outsourcing, debt collection services, hardware distributors, meter providers/rental services, and goods. The desk research involved reviewing the level of engagement the supplier has in managing and addressing human rights, modern slavery, sanctions, and anti-bribery and corruption risk, and was based on publicly available primary data sources. Overall our supply chain was deemed to be low risk. In addition, new suppliers and existing suppliers at contractual renewal are sent our Supplier Code of Conduct. This Code of Conduct sets out the standards we expect our suppliers to adhere to, including compliance with laws and regulation, respecting human rights, a zero tolerance approach to bribery and corruption, robust security and privacy measures and good environmental stewardship. For high risk suppliers (determined by counterparty location and the nature of the contract) we conduct additional due diligence on modern slavery.				

3 - Disclosure Tables: Governance continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
What are the company's salient human rights issues relating to workers' rights in the company's value chain? Select the area of the business as applicable.	Narrative	WDI 2.6	Protecting vulnerable customers: As a provider of household utilities, we are acutely aware of our responsibility to support vulnerable customers, particularly in light of the cost of living crisis. Supporting our vulnerable customers has therefore been, and continues to be, a key focus area for the business. Supply chain management: Electronics manufacturing is identified by the United Nations Global Compact as a sector that has high risks of forced labour and excessive working hours. As we are involved in purchasing handsets and routers we we have a responsibility to identify and mitigate against potential Human Rights issues with the suppliers of these products.				
Anti-corruption							
Operations assessed for risks related to corruption Total number of operations assessed for risks related to corruption Percentage of operations assessed for risks related to corruption Significant risks related to corruption identified through the risk assessment	Number, %, narrative	GRI 205-1	9, 100%, all deemed low risk	9, 100%, all deemed low risk	9, 100%	9, 100%	
Total number and % of business partners that the organisation's anti-corruption policies and procedures have been communicated to broken down by type of business partner and region. Describe if the organisation's anti-corruption policies and procedures have been communicated to any other persons or organisations	Number, %	GRI 205-2	100% of UW Partners. 99 new suppliers (100%) were sent our Supplier Code of Conduct, through our new contract lifecycle management platfom.	100% of UW Partners. 90 new suppliers (100%) signed up to the Supplier Code of Conduct.	100% of UW Partners. 47 new suppliers (90%) signed up to the Supplier Code of Conduct.	Information not available	
Total number and nature of confirmed incidents of corruption	Number	GRI 205-3	0	0	0	0	

3 - Disclosure Tables: Governance continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	Number	GRI 205-3	0	0	0	0	
Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	Number	GRI 205-3	0	0	0	0	
Public legal cases regarding corruption brought against the organisation or its employees during the reporting period and the outcomes of such cases	Number	GRI 205-3	0	0	0	0	
Customer privacy							
Substantiated complaints concerning breaches of customer privacy and losses of customer data. Total number of substantiated complaints received concerning breaches of customer privacy categorised by: - Complaints received from outside parties and substantiated by the organisation - Complaints from regulatory bodies	Number	GRI 418-1	13 57	13 0	6 0	19 0	The number of complaints increased in FY24 as there was a delay in our DSAR response times (due to a spike in the number of DSARs driven by the energy crisis), prompting complaints to the regulator. The regulator was fully aware of the situation and the reasons behind it.

3 - Disclosure Tables: Governance continued

Disclosure	Unit	Reference	FY 24	FY 23	FY 22	FY 21	Notes
Total number of identified leaks, thefts or losses of customer data	Number	GRI 418-1,	**0**	o	Not reported	Not reported	
Marketing and labelling							
Incidents of non-compliance concerning marketing communications a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by: i. incidents of non-compliance with regulations resulting in a fine or penalty ii. incidents of non-compliance with regulations resulting in a warning iii. incidents of non-compliance with voluntary codes	Number	GRI 417-3	0	0	Not reported	Not reported	

4 - Double materiality key topics and definitions

Material topics and definitions

Environmental	**Reducing greenhouse gas emissions**	Reducing GHG emissions from the products and energy that UW sells to customers and uses in their own offices by reducing fossil fuel-based energy and offering low carbon home solutions to customers.
	Energy efficiency advice	Providing customers with energy saving advice and information to enable them to reduce their energy usage.
	Nature and biodiversity	Understanding our company's impact on nature and biodiversity whilst supporting organisations and projects that protect and restore them.
	Circular economy	Ensuring that products, services and operations support a circular economy model by promoting the redesign, re-use and recycling of devices, hardware and all associated packaging and collateral to reduce waste.
Social	**Positive economic impact on communities**	Providing employment and flexible earning opportunities to support colleagues and partners respectively.
	Diversity and Inclusion	Creating a culture where diversity, of thought, background and approach, is proactively sought out and valued.
	Cybersecurity	Application of technologies, processes, and controls to protect systems, networks, programs, devices and data from cyber attacks.
	Inspiring, developingand supporting our people	Promoting a positive company culture, providing employee training and skills development, ensuring employee engagement, and promoting the physical and mental health and wellbeing of our colleagues
	Customer health, safety and well-being	Protecting customers' safety online and offline and providing health and safety advice in relation to the services provided by UW.
	Protecting vulnerable customers	Protecting and supporting vulnerable customers.
	Communities and charity	Supporting community groups and causes and contributing to local and national charities.
Governance	**Business resilience and continuity of supply**	Ensuring robust systems, processes and procedures are in place to manage any service disruption and ensure business continuity.
	Governance, business ethics and transparency	Robust and responsible corporate leadership relating to business ethics, regulatory compliance, risk management, transparency in reporting and financial disclosures.
	Human rights and supply chain management	Monitoring and ensuring the safety, wellbeing and respect for workers' rights in our own operations (e.g. employees, contractors) and in our supply chain.
	Responsible sales and marketing	Ensuring that marketing communications and creative content are clear, fair, inclusive and respectful and all customer product and marketing materials are accurate, transparent and not misleading.

TelecomPlus

508 Edgware Road
The Hyde, London
NW9 5AB
020 8955 5000
shareholders@uw.co.uk