

# Telecom Plus PLC ("the Company")

## **Modern Slavery Statement**

#### Introduction

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all our business relationships and undertake appropriate due diligence to identify and assess potential risk areas and mitigate the risk of slavery and human trafficking occurring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act") and constitutes our group's slavery and human trafficking statement for the financial year ending 31 March 2019.

This statement covers the following group entities which meet the reporting threshold requirements as set out in the Act:

Telecom Plus PLC

**Utility Warehouse Limited** 

**Electricity Plus Supply Limited** 

Gas Plus Supply Limited

### Structure and supply chains

Telecom Plus PLC, which owns and operates the Utility Warehouse brand, is the UK's only fully integrated provider of a wide range of competitively priced utility services spanning the communications, energy (gas and electricity) and insurance markets.

The Company acts as a reseller of utility services and its supply chain is dominated by large, long-standing, highly regulated companies operating in the communications, energy and insurance markets.

# Policy on modern slavery

The Company is committed to ensuring as far as possible that there is no modern slavery or human trafficking in its supply chain. We will not work with any business knowingly involved in modern slavery or human trafficking.

# Due diligence processes and risk assessment

The Company understands that the biggest risk for modern slavery is in our supply chains. However, the vast majority of the Company's suppliers are UK-based and not in high risk industries, or supplying products or services in high risk groups.

Nonetheless, the Company applies a proportionate, risk-based approach to due diligence on suppliers taking into account factors including the relative size of the supplies being made to the Company, the nature of the supplier's business, whether the supplier operates in a highly regulated market and the geographical location of the supplier's business.

### Measuring effectiveness

Where deemed appropriate, and following a risk analysis, the Company has itself visited, and commissioned independent quality reports into certain suppliers. No areas of concern have been identified as a result of these reports.

### **Training for staff**

The Board is committed to operating the business in an honest and ethical manner and the implementation of this strategy is mainly set out in the Company's wide-ranging anti-bribery and corruption policy. The policy is detailed in the staff handbook and training on the policy forms part of the induction of new employees. The Company operates a confidential whistle-blowing policy where employees can, if necessary, report any governance concerns they have directly to a nominated non-executive director of the Board.

The Company has a limited number of employees who are responsible for managing the relationships with the Company's supply chain. However, in order to further mitigate the risk of modern slavery occurring within the business or its supply chain, the Company is planning to conduct a review of targeted staff training in this area and introduce a more formal risk-based appraisal process for suppliers going forward.

### **Declaration**

This statement was approved by the Board of directors of the Company on 23 April 2019.

Andrew Lindsay MBE

**Chief Executive Officer** 

**Telecom Plus PLC**