



Modern Slavery Act Transparency Statement

KCOM is the trading name of KCOM Group PLC and its subsidiary companies. Registered office 37 Carr Lane, Hull, HU1 3RE
Registered number 2150618

Introduction

Slavery and human trafficking are a shocking reality of the world in which we live and at KCOM we are committed to doing all we can to assist in the eradication of such activities. We have a zero tolerance approach to any slavery or human trafficking activity within our business or in our supply chain.

In this statement we set out the steps we are taking to seek to identify and remove any slavery or human trafficking from our business and supply chain.

About KCOM

KCOM is a leading provider of communications services and IT solutions to organisations and consumers. We are one of the oldest communications services companies in the UK, with our foundations dating back to 1904 when a quirk of history gave Hull and East Yorkshire its own phone company.

We now operate as one brand across three different markets:

- Enterprise – we help large organisations make the most of technology to serve their customers better and address other business challenges;
- Hull and East Yorkshire – we provide a range of voice and broadband services to consumers and businesses in the Hull and East Yorkshire region; and
- National Network Services – we provide connectivity-based services to national organisations, seeking to maximize the value of our historic investment in national network platforms.

Our supply chain

We operate entirely in the UK and buy a large proportion of our goods and services locally in the Hull and East Yorkshire region.

In total we use over 1,000 suppliers across the business to provide goods and services that we either use internally, in our own offices, or that we pass on to our customers. We buy 93.5% of our goods and services from within the UK, with 3.3% from Europe, 3.0% from the United States of America and the remaining 0.2% from Australia, and Canada.



Some of our suppliers have their own suppliers which can make our supply chain quite complex. We therefore have a Supplier and Partner Code of Conduct, which we require all of our suppliers and partners to comply with and pass on to any other suppliers that they use to provide goods or services to us. This sets out our expectations of how they will conduct themselves from an ethical, legal and moral perspective and this has been updated to reflect the requirements of the Modern Slavery Act.

We continue to risk assess each of our suppliers in relation to slavery and we categorise them into a high, medium or low risk category. This may be because of the location in which they operate or because of the type of product or service that they provide. We then seek to work with any in a high risk category to determine how these risks are being addressed and to satisfy ourselves that the risks are being satisfactorily mitigated. We also speak to suppliers in a medium risk category to discuss the controls and other mitigations they have in place in relation to their business and supply chain.

Our people

We have an Ethics and Anti-Fraud Policy which all of our people are expected to be familiar with and to comply with at all times. This covers the standards and behaviours that we expect from our people and the way in which we want to do business. This has been updated to reflect the anti-slavery stance of KCOM and covers a number of areas, including how to speak up if any of our people become aware of an ethical or moral issue in any part of our business.

We also have a Bullying and Harassment Policy, which sets out how our people should behave towards each other and those outside of KCOM that we come into contact with through our work. We also require all of our people to complete online training in relation to Bullying and Harassment to ensure their understanding of our policy.

In 2017 we have held specific training in relation to slavery and human trafficking for our people who work in purchasing or procurement as well as some of our HR team, so that they are more aware of the risks in relation to these and the warning signs to be looking out for.

Ensuring compliance

We have a number of mechanisms in place to ensure that our policies are being followed and that the controls in place are effective. These include audits by our Standard & Compliance team and our internal auditors and the monitoring of completion rates of our online learning modules.

Speaking up

We have a Speaking Up Policy in place which encourages people both in and outside of KCOM to speak up if they become aware of any practices that breach our policies or are inconsistent with the way in which we want to work. People can raise concerns completely anonymously if they wish to do so and can speak to people either inside or outside of KCOM. Any concerns raised are independently investigated and the concerns and investigations are reported to our Audit Committee to ensure that they are satisfied that the concern has been appropriately addressed.

This statement covers the period from 1 April 2016 to 31 March 2017 and has been approved by the Board of KCOM Group PLC. Our next statement, covering the period from 1 April 2017 to 31 March 2018, will be published by the end of September 2018.



Bill Halbert
Chief Executive