



Modern Slavery Act Transparency Statement

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

Introduction

Slavery and human trafficking are an unacceptable reality of the world in which we live. 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 identify any slavery or human trafficking from our business and supply chain, and remove the risk wherever it may be found.

This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

Organisation Structure and supply chain

KCOM is one of the longest-established communications companies, connecting customers since 1904.

Our principal activities are:

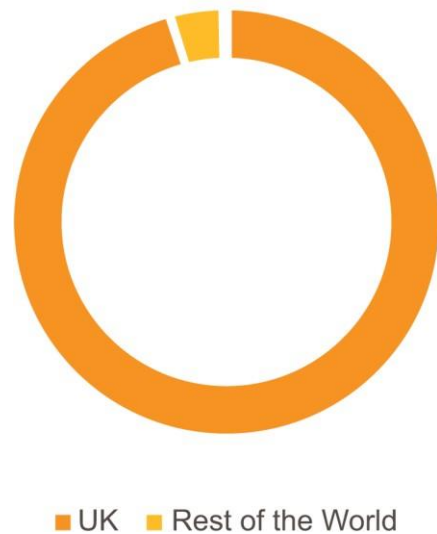
- > KCOM Consumer is the leading communications provider in Hull and East Yorkshire, connecting homes in the region to our award-winning full fibre internet and phone services. The team are redefining the in-home experience with new capabilities for personalisation, prioritisation and protection of customer's connectivity.
- > KCOM Enterprise supplies wholesale connectivity and voice services to KCOM's Consumer team and other communications providers in the region. It also partners with thousands of small businesses, major public sector organisations and local charities to supply their connectivity and other services.
- > KCOM Networks maintains and supports KCOM's internet networks and infrastructure, underpinning the connectivity offered through Consumer and Enterprise and ensuring a fast, reliable and safe network for our customers and partners.

We employ 700 people in the UK, and wherever possible and where it is commercially feasible to do so we purchase goods and services from suppliers in the Hull and East Yorkshire region.

We have over 620 active suppliers that provide goods and services that we use directly or indirectly in the provision of services to our customers. The main categories of procurement are technology and network goods and services.

Based on the overall business sector the risk in our supply chain is deemed to be fairly low with up to 95% of goods and services purchased from suppliers with UK head offices and the remaining 5% purchased from suppliers based in Europe, United States of America, Australia, India or Canada. Where a supplier is classified as high risk further due diligence is conducted throughout its supply chain as well as frequent supplier review meetings to ensure that the supplier is operating in line with agreed terms and conditions.

Location of Suppliers



KCOM suppliers and, where necessary, their supply chain, are required to comply with our Supplier Code of Conduct. This is referred to in both our standard terms and conditions and the framework agreements which suppliers receive with every purchase order issued. The Code sets out our expectations regarding how suppliers should conduct themselves from an ethical, legal and moral perspective and reflects the requirements of the Modern Slavery Act.

Governance

KCOM is committed to doing all it can to assist in the eradication of slavery and human trafficking and will not tolerate any such activity within the business or in its supply chain. To identify and manage slavery and human trafficking risks, we integrate this into our risk management framework.

Our Risk team is responsible for embedding our modern slavery policies, governance process and training our people across the business. They are also responsible for reporting all modern slavery risks or concerns to the KCOM Board and Audit and Risk Committee who oversee our modern slavery approach.

Policies in relation to slavery and human trafficking

Our policies set out our expectations of how we work and what we expect from our people and our supply chain.

Policies relevant to modern slavery and human trafficking:

- > Employee Handbook
- > Procurement and Vendor Management Policy
- > Supplier Code of Conduct
- > Recruitment and Selection Policy
- > Ethics and Anti-Fraud Policy
- > Speaking Up Policy.

Due diligence

We undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers. Our due diligence and reviews include:

- > Evaluating the modern slavery and human trafficking risks of each new supplier
- > Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified, and
- > Developing a system for supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain.

We encourage all our employees, customers and suppliers to report any concerns related to the direct activities, or the supply chain, of our organisation. This includes any circumstances that may give rise to an

increase in risk of slavery or human trafficking. We have a Speaking Up Policy in place which encourages people 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. Our Speaking Up Policy is designed to make it easy for individuals to make disclosures, without fear of retaliation. Any concerns raised are independently investigated and the concerns and investigations are reported to our Board to ensure that they are satisfied that the concern has been appropriately addressed.

Risk assessment

Our highest risk areas for modern slavery and human trafficking are in our supply chain for:

- > network equipment manufacturing
- > construction and engineering services to our infrastructure
- > cleaning services used in our business.

Our Procurement team follow the supplier set-up process to ensure that all suppliers are vetted accordingly. As part of the supplier set-up process suppliers are asked to complete a corporate responsibility questionnaire, that includes modern slavery questions, so that any risks are known prior to engagement. Once a supplier is included on the preferred supplier list the supplier is categorised based on risk and criticality so that they can be monitored in accordance with our Procurement Policy governance and processes.

Training on modern slavery and trafficking

Training is provided to relevant teams to ensure that they understand what modern slavery is, how to spot the signs in the workplace and supply chains, know our policies and how to report it.

Key performance indicators

We have established Key Performance Indicators (KPIs) to allow us to monitor and report on the effectiveness of our policies and actions to mitigate the risk of modern slavery. These KPIs are reported to our Board.

Key Performance Indicator (KPI)	Reason for KPI	2023/24	2024/25
% of staff who completed 'Modern Slavery' training	By monitoring completions, we track employee understanding of modern slavery	N/A	96.3%
Number of modern slavery concerns reported via our Speaking Up process	By monitoring the number of issues identified, we can improve our policies and procedures	0	0

This statement covers the period from 1 April 2024 to 31 March 2025 and has been approved by the Board of KCOM Group Limited. Our next statement, covering the period from 1 April 2025 to 31 March 2026, will be published by the end of September 2026.

Richard Schäfer
Interim Chief Executive Officer