



# 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 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 service's 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 two different markets:

- Consumer & Regional – we provide a range of voice and broadband services to consumers and small businesses in the Hull and East Yorkshire region.
- Business – we provide connectivity-based services to national organisations, seeking to maximise the value of our historic investment in national network platforms. We also help large organisations make the most of technology to serve their customers better and address other business challenges.

## 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 95.7% of our goods and services from within the UK, with 3.8% from Europe and the remaining 0.5% from the United States of America, Australia and Canada.



KCOM suppliers and, where necessary, their supply chain, are required to comply with the Supplier Code of Conduct. This sets out our expectations of how suppliers will conduct themselves from an ethical, legal and moral perspective and this has been updated to reflect the requirements of the Modern Slavery Act.

## Our people

We have an Ethics and Anti-Fraud Policy, with which all of our people are expected to be familiar and to comply 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 to people outside of KCOM with whom we come into contact through our work.

In 2017 we 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.

## 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 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.

## 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 Risk team and our internal auditors and the monitoring of completion rates of our online learning modules.

This statement covers the period from 1 April 2018 to 31 March 2019 and has been approved by the Board of KCOM Group PLC. Our next statement, covering the period from 1 April 2019 to 31 March 2020, will be published by the end of September 2020.



Graham Sutherland  
Chief Executive