

Modern Slavery and Human Trafficking

Consultant Connect is aware of the risk of modern slavery and human trafficking as is careful to ensure its policies and practices are designed to minimise this risk.

Policy

This policy applies to our suppliers and all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

In addition, our other policies cover related topics including Ethical Trading, Corporate and Social Responsibility, Abuse, Recruitment and Whistleblowing.

Commitment

Consultant Connect Limited acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions outlined in the Modern Slavery Act of 2015. We understand that this requires an ongoing review of both our internal practices in relation to our labour force and, additionally, our supply chains.

We do not enter into business with any other organisation, whether in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

Definitions

Consultant Connect Limited considers that modern slavery encompasses:

- Human Trafficking
- Forced work through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse, or the threat of abuse
- Being dehumanised, treated as a commodity or being bought and sold as property
- Being physically constrained, or to have restriction placed upon an individual's freedom of movement

Organisation

Our statement regarding Modern Slavery (see below) applies to Consultant Connect Limited. The information included in this statement is applicable year-round and is reviewed annually.

Organisation Structure and Business

Consultant Connect Limited is a limited company, founded in March 2015, which became a subsidiary of the New York Stock Exchange listed Teladoc Inc group as from January 2021.

We currently deliver healthcare communications services to the majority of NHS regions across the UK. Demand for our services is consistently high throughout the year and is not subject to seasonal change.

Staff and Training

No labour retained by Consultant Connect Limited in the provision of its own services is obtained by means of slavery or human trafficking. We are consistent with our use of standard employment contracts which pay at levels above the Statutory Minimum Wage.

All staff are provided with training on all polices, including coverage of Modern Slavery and Human Trafficking upon induction and as part of regular ongoing refresher training.

We adhere to, and in many cases exceed, the requirements of all relevant UK employment legislation and regulation, and our approach is set out as a distinct section in our HR Policy.

Supply Chains

We are committed to ensuring complete transparency not only in our own business but also in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our consultants, suppliers and business partners ('Suppliers').

Potential Exposure and Risk Assessment

Consultant Connect Limited considers its main exposure to the risk of slavery and human trafficking as being through suppliers supporting our organisation with non-service delivery related activities.

Whilst we consider our exposure to slavery/human trafficking to be relatively limited and recognise that suppliers, as separate entities, are outside of our control we do undertake due extensive diligence procedures to minimise the risk as far as possible.

Due Diligence Steps

Our Subcontractor policy requires a Due Diligence Review of all proposed subcontractor relationships to understand the controls that are in place and confirm their compliance with all of Consultant Connect's polices including those relating to Modern Slavery and Human Trafficking.

This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our antislavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay employees at least the National Minimum Wage
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

In accordance with section 54(4) of the Modern Slavery Act 2015, Consultant Connect Limited has taken the following steps to ensure that modern slavery is not taking place:

- An annual review of supplier contracts to identify and assess the potential risks in its supply chains. This includes power of contract termination in the event that the supplier is, or is suspected, to be involved in modern slavery.
- An annual assessment of its services concerning potential instances of slavery and reporting of actions taken to address the risk to modern slavery, all included in the Modern Slavery Statement

- Consultant Connect Limited has a zero-tolerance policy towards modern slavery. There is no exception to this and applies to all workers within Consultant Connect Limited.

We may terminate the contract at any time should any instances of modern slavery come to light.

Consultant Connect Limited has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Key Performance Indicators

Consultant Connect Limited has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Consultant Connect Limited or its supply chains:

- Compliance with staff training schedule
- Compliance with Subcontractor Due Diligence Reviews
- Compliance with annual review of all Policies, including those covering Modern Slavery and Human Trafficking

In line with the Modern Slavery Act 2015 we will review and update the Modern Slavery Statement annually to confirm the actions taken to ensure slavery and human trafficking is not taking place in our supply chain or own business.

Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with Suppliers, individuals and organisations working with us or on our behalf if they breach this policy.

Reporting Concerns

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or in the supply chains of any supplier tier at the earliest possible stage.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their Manager or the Legal Team, following the Whistleblowing Policy as necessary.

Modern Slavery Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery.

Consultant Connect is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

We are also committed to ensuring there is transparency not only in our own business but also in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our consultants, suppliers and business partners ('Suppliers').

This policy applies to our Suppliers and all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners..