



POLICY OWNER

Caughey Zachery

Scrum Master

APPROVED

25 September 2026

Emma Bourgraf, Stevy Rogers

VERSION

1.0

Managing Members approval

NEXT REVIEW

25 September 2027

Annual review

INTERNAL POLICY

Modern Slavery and Speak-Up Policy

Applies to all employees, contractors and Managing Members of VES, LLC (trading as VRpatients).



01

PURPOSE

This policy sets out VRpatients' zero-tolerance approach to modern slavery and human trafficking. It explains how we prevent modern slavery in our business and supply chain, and how anyone can raise a serious concern safely.

02

SCOPE

This policy applies to:

- all employees and Managing Members of VES, LLC
- independent contractors working for us
- our suppliers, through our Supplier Code of Conduct

The Speak-Up part of this policy (section 7) covers:

- modern slavery and human trafficking
- other serious legal wrongdoing connected with our business
- other serious ethical wrongdoing connected with our business

Everyday workplace matters, such as personal grievances, working relationships or conduct issues, are handled by HR under our other policies.

03

POLICY STATEMENT

Modern slavery is a crime and a serious violation of human rights. It includes:

- slavery, servitude, and forced or compulsory labour

- bonded or debt labour
- child labour
- human trafficking

What these have in common is that people are deprived of their freedom so that someone else can exploit them.

VRpatients will not tolerate modern slavery in any part of our business or supply chain. We will act ethically and with integrity in our business relationships, and we will take proportionate steps to identify, prevent and address modern slavery risks.

04 RESPONSIBILITIES

Managing Members Emma Bourgraf, Stevy Rogers	Approve this policy and the annual public statement. Make sure resources are available to put this policy into practice.
Policy owner Caughey Zachery	Maintain this policy and the supplier risk register. Coordinate the annual Modern Slavery Assessment Tool (MSAT) submission and the public statement. Receive and oversee Speak-Up reports.
Hiring managers	Follow the recruitment practices in section 5.
Staff who engage suppliers or contractors	Follow the supplier process in section 6 before engaging a new supplier or contractor.
All staff	Read and follow this policy. Complete assigned training. Report concerns under section 7.

05 RECRUITMENT AND EMPLOYMENT

We will:

- recruit directly, or only through reputable agencies that don't charge candidates fees
- verify every new hire's eligibility to work
- give every employee written terms of employment setting out pay, hours and conditions
- pay at least the legal minimum wage, and comply with working-time laws where our people are based
- never charge recruitment fees to candidates or employees
- never take or hold employees' identity documents
- respect every employee's right to leave their employment on reasonable notice

Our supply chain is almost entirely software and cloud services, and our overall risk is low. Our approach is proportionate to that risk.

- **Supplier risk register.** The policy owner keeps a register of material suppliers and contractors. For each one it records the service provided, a risk rating, whether the supplier publishes a modern slavery statement, and the next review date.
- **Large, established suppliers.** Where a supplier publishes its own modern slavery statement or an equivalent supplier code, we record it in the register and accept it as meeting our standard.
- **Contractors and smaller suppliers.** These are asked to confirm they will comply with our Supplier Code of Conduct. From 25 September 2026, the Code is available for inclusion in new contractor and supplier agreements. Existing contractors will be asked to confirm the Code.
- **Before engaging a new supplier or contractor,** staff must notify the policy owner so it can be added to the register.
- **Annual review.** The register is reviewed at least once a year, and whenever our services or supply chain change significantly.

7.1 Who can raise a concern

Anyone can raise a concern within the scope of section 2: employees, contractors, suppliers, customers or members of the public.

7.2 How to raise a concern

SPEAK-UP CONTACTS	
Primary contact	Caughey Zachery, Scrum Master czachery@vrpatients.com
Alternative contact	Emma Bourgraf, Director of Global Strategy and Operations ebourgraf@vrpatients.com Use this contact if your concern involves the primary contact.
General inbox	admin@vrpatients.com Concerns sent here are passed to the policy owner.
Anonymous reporting	[Microsoft Form link] The form does not record your name or email unless you choose to give contact details.

You don't need proof to raise a concern, only a reasonable belief that something is wrong.

7.3 External routes

You can also contact these services directly:

EXTERNAL HELPLINES

UK	Modern Slavery & Exploitation Helpline, 08000 121 700 (24/7)
US	National Human Trafficking Hotline, 1-888-373-7888 (24/7)
Immediate danger	Call 911 (US) or 999 (UK)

7.4 What happens next

- 1 If you've given contact details, we acknowledge your concern within 5 working days.
- 2 The policy owner, or the alternative contact where appropriate, assesses the concern and investigates it promptly and fairly.
- 3 We keep your identity confidential and share it only where necessary to investigate or where the law requires.
- 4 Where appropriate, and where we have a way to contact you, we let you know the outcome.

7.5 Protection from retaliation

Nobody will be dismissed, disciplined or treated unfairly for raising a concern in good faith, even if the concern turns out to be mistaken. Retaliating against someone who has spoken up is a serious disciplinary matter.

Knowingly making a false or malicious report is also a disciplinary matter.

08

IF MODERN SLAVERY IS IDENTIFIED

If we find, or reasonably suspect, modern slavery in our business or supply chain, we will:

- 1 put the safety and wellbeing of the people affected first
- 2 report it to the relevant authorities where appropriate
- 3 work with the supplier to put things right where that is possible and safe
- 4 end the relationship if the supplier won't put things right, or if the breach is serious
- 5 record what happened and what we learned, and update this policy and the risk register

09

TRAINING AND AWARENESS

- All staff are made aware of this policy at onboarding and whenever it changes.
- Staff who hire or engage suppliers complete modern slavery awareness training by 31 December 2026, and every year after that.

- The policy owner keeps a record of who has completed training.

10

**BREACHES OF THIS
POLICY**

Breaching this policy may lead to disciplinary action, up to and including dismissal. If a contractor or supplier breaches it, we may end our relationship with them.

11

MONITORING AND REVIEW

The policy owner will:

- review this policy, the supplier risk register and the public statement at least once a year
- complete the MSAT each year and act on its recommendations
- report the following to the Managing Members each year:
 - percentage of suppliers and contractors reviewed
 - percentage of relevant staff trained
 - number of concerns raised and how they were resolved

CONTACT

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