Teleconsult
Smarter teleradiology, Better patient care.

TELECONSULT ETHICAL TRADING POLICY

POLICY TITLE:	ETHICAL TRADING POLICY
OUTCOME:	TELECONSULT WILL TAKE ALL REASONABLE PRECAUTIONS TO ENSURE THAT THERE IS NO ACTUAL OR POTENTIAL CONFLICT OF INTEREST IN PROVIDING ITS TELERADIOLOGY HEALTHCARE SERVICE.
TARGET AUDIENCE:	ALL MEMBERS OF TELECONSULT LTD STAFF, WHETHER EMPLOYED FULL-TIME OR PART-TIME, PAID OR UNPAID, GRANTED PRACTISING PRIVILEGES, VOLUNTEERS, STUDENTS, AND EXTERNAL CONTRACTORS.
APPROVED BY:	AGUSTIN CORSI, MANAGING DIRECTOR (CQC NOMINATED INDIVIDUAL)
DATE ISSUED:	29 OCTOBER 2025
NEXT REVIEW DATE:	29 OCTOBER 2026 (OR BEFORE IF THERE IS A CHANGE IN PRACTICE OR CIRCUMSTANCES)

VERSION CONTROL

Version	Date	Change history
1.0	19-10-2024	First version
1.1	1-1-2025	Addition of references
1.2	18-4-2025	Radiologist not reporting for clients where they are employed
1.3	10-7-2025	Changed Radiologist to Reporter
1.4	29-10-2025	Further specifications regarding Modern Slavery

Teleconsult
Smarter teleradiology, Better patient care.

Contents

1. Introduction

At Teleconsult, we are committed to maintaining the highest standards of ethical trading practices within our organisation and our supply chain. We expect all employees and partners to conduct themselves with integrity, honesty, and transparency in all interactions. Our approach prohibits the use of high-pressure techniques, withholding information, or engaging in any unethical practices that prioritise financial or commercial gain over customer well-being. We adhere to all relevant applicable laws, legislation and regulations, including but not limited to:

- Consumer Protection Laws
- Competition Laws
- Anti-bribery and Corruptions Laws
- Advertising Regulations
- Equality, Diversity and Inclusion
- Conduct Regulations
- Modern Slavery
- International Labour Standards

This policy should be read in conjunction with the Anti Bribery and Anti Corruption policy.

2. Ethical Trading Practices

Teleconsult's definition of Ethical Trading practices include:

- Honest and accurate representation of products or services
- Transparent pricing and terms
- Respectful and fair treatment of customers
- Avoidance of deceptive or misleading tactics
- Compliance with laws and regulations governing trading activities
- Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibit any threat of violence, harassment and intimidation
- Prohibit the use of worker-paid recruitment fees
- Prohibit compulsory overtime
- Prohibit child labour
- Prohibit discrimination
- Prohibit confiscation of workers original identification documents
- Provide access to remedy, compensation and justice for victims of modern slavery

3. Core Principles

At Teleconsult, our core principles are:

- Respect for our Code of Ethics
- Respect for Working Relationships
- Respect for Honesty and Transparency
- Respect for Confidentiality and Privacy
- Respect for Laws
- Respect for Diversity

- Commitment to Professional Development

4. Prohibited Practices

Teleconsult defines prohibited practices as:

- Not align to the requirements of the Framework Agreement, Specification and any subsequent Call-off Contract;
- Accept third-party financial incentives or gifts outside of agreed policies;
- Not act in accordance with Laws, Guidance and Good Industry Practice; and
- Utilise high-pressure techniques, support the withholding of information or utilise unethical practices that promote financial and commercial gain;
- Reporters reporting for clients where they are employed.

5. Remedial Actions

Should a member of staff be found to not comply with these ethical requirements, the following remedial actions will be taken by Teleconsult:

Re-Training and Guidance - The employee will be required to undergo re-training on our company's Ethical Trading Practices Policy. This training will emphasise the principles of honesty, transparency, and customer-centricity in all stakeholder engagements. Training covers the following topics:

- Legal Compliance
- Good Industry Practice
- Ethical Trading Practices
- Modern Slavery
- Anti Bribery & Corruption
- Conflict of Interest
- Objection Handling
- Duty of Candour
- Good Governance
- Data Protection / GPDR

Performance Improvement Plan (PIP) - If the non-compliance persists, a formal Performance Improvement Plan (PIP) will be initiated by Teleconsult. The PIP will outline clear expectations, objectives, and timelines for the employee to demonstrate adherence to ethical trading practices. The appropriate line manager (Typically Chief Operating Officer) will work with the employee during this time to provide as much support and guidance as possible.

Close Supervision and Monitoring - During the PIP period, the employee's activities will be closely monitored by the Chief Operating Officer. Regular feedback sessions will be conducted to assess progress and provide guidance for improvement.

Loss of Privileges - In cases of repeated or serious violations, the employee may temporarily lose certain privileges, such as the ability to handle specific frameworks/contracts or interact with certain customer segments. This measure aims to prevent further breaches while encouraging adherence to ethical standards.

Disciplinary Action - Continued non-compliance may result in disciplinary action, ranging from written warnings to suspension without pay, depending on the severity of the violations. All disciplinary actions will be documented and communicated to the employee in writing. Our

HR Team is responsible for managing disciplinary Action. Our Disciplinary action process includes:

- Verbal Warning
- Written Warning
- Final Warning
- Dismissal

Termination of Employment - In extreme cases where the employee fails to meet the required standards of ethical trading practices despite interventions, termination of employment may be necessary. This decision will be made in accordance with company policies and legal requirements.

Should a member of our supply chain be found to not comply with these ethical requirements, the following remedial actions will be taken by Teleconsult:

Communication and Guidance – Should a partner of Teleconsult be found to be acting in a way which contravenes our policies in the first instance we would seek to engage with relevant stakeholders at a Senior level within the business to understand the why of these actions. Following this we would seek to offer support and guidance, and where appropriate Training to support full compliance. This training will emphasise the principles of honesty, transparency, and customer-centricity in all stakeholder engagements. Training is delivered by the Teleconsult learning environment, and covers the following topics :

- Legal Compliance
- Good Industry Practice
- Ethical Trading Practices
- Anti Bribery & Corruption
- Conflict of Interest
- Objection Handling
- Duty of Candour
- Good Governance
- Data Protection / GPDR

Performance Improvement Plan (PIP) - If the non-compliance persists, a formal Performance Improvement Plan (PIP) will be initiated by Teleconsult. The PIP will outline clear expectations, objectives, and timelines for the supply chain member to demonstrate adherence to ethical trading practices. The appropriate line manager will work with the partner during this time to provide as much support and guidance as possible.

Close Supervision and Monitoring - During the PIP period, the partners activities will be closely monitored by the Chief Operating Officer. Regular feedback sessions will be conducted to assess progress and provide guidance for improvement.

Termination of Supplier Contract - In extreme cases where the supply chain partner fails to meet the required standards of ethical trading practices despite interventions, termination of the contract and replacement may be necessary. This decision will be made in accordance with company policies and legal requirements. Issues that involve human risk or wellbeing, like modern slavery issues, will be picked up without delay.

Review and Continuous Improvement - Throughout the remedial process, Teleconsult will continuously review and evaluate the effectiveness of the measures implemented. Feedback from both the employee/supply chain partner and relevant stakeholders will be considered to refine our Ethical Trading Practices Policy and training programs. Information will be reviewed and collected via feedback collection, regular review meetings and annual surveys – as well as

spot checks with candidates and clients to attest to the service provided by Teleconsult. Any updates to policies will be communicated centrally in writing and require employee sign off for verification. Updated training will be supplied annually and any roll out of changes will be notified with appropriate notice.

6. Reporting

Employees are encouraged to report any concerns or observations of unethical trading practices by our employees or members of the supply chain through our confidential reporting channel. Reports will be investigated promptly and impartially, with appropriate actions taken to address any misconduct. Employees can raise concerns by the following means:

Email: natascha.smits@teleconsult.net

7. Summary

At Teleconsult, we believe that ethical trading practices are fundamental to building long-lasting customer and supply chain relationships and maintaining our reputation in the marketplace. We are committed to supporting our employees in upholding these standards, while also holding individuals accountable for their actions. By adhering to this policy, we ensure that our trading practices align with our values of integrity, transparency, and customer satisfaction.

This Ethical Trading Practices Policy and its associated remedial actions are effective immediately upon adoption.

8. Guidance And Further Reading

- Care Quality Commission Fundamental Standards
  https://www.cqc.org.uk/what-we-do/how-we-do-our-job/fundamental-standards
- GMC - Financial and commercial arrangements and conflicts of interest (2013)
  https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/financial-and-commercial-arrangements-and-conflicts-of-interest
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
  http://www.legislation.gov.uk/uksi/2014/2936/contents/made
- The Bribery Act 2020 Quick Start Guide:
  https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832012/bribery-act-2010-quick-start-guide.pdf
- Modern Slavery Act 2015