

MODERN SLAVERY STATEMENT

TOTALLY PLC (www.totallyplc.com)

This statement applies to all companies within and associated to Totally PLC (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year 2018/19.

ORGANISATIONAL STRUCTURE

The Group is engaged in addressing the challenges of the UK healthcare sector by delivering out-of-hospital care and providing a range of innovative services to the UK healthcare sector. The Group consists of multiple subsidiaries including Premier Physical Healthcare, About Health, Totally Health, Optimum, My Clinical Coach, Vocare and Greenbrook Healthcare.

All subsidiaries have internal hierarchy structures who are controlled by Totally PLC. The board of directors of Totally PLC are responsible in ensuring the hierarchy of the subsidiaries meet corporate governance requirements around Clinical, Finance, HR, Social and Environmental areas.

The Group operate services at multiple operating sites across all regions within England.

The Group through its subsidiaries provides services by driving innovation and providing a range of responsive and preventative healthcare services in community settings, urgent care centres, GP surgeries, prisons, workplaces and patients' homes, from pre-diagnosis to discharge. These out of hospital services include NHS 111, GP Out of Hours care, Physiotherapy, Podiatry, Dermatology, Referral Management Services and Clinical Health Coaching. The Group operates numerous contracts with the NHS as well as other public and private sector organisations across England.

DEFINITIONS

The Group 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 or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

Totally PLC and its subsidiaries acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its workforce and, additionally, its supply chains.

Totally PLC and its subsidiaries does not enter into business with any other organisation, in the United Kingdom, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No workforce provided to Totally PLC and its subsidiaries in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group subsidiaries strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in UK.

SUPPLY CHAINS

In order to fulfil its activities, Totally PLC and its subsidiaries main supply chains are reviewed in accordance to strict corporate governance processes and reviewed annually to ensure compliance.

POTENTIAL EXPOSURE

In general, Totally PLC and its subsidiaries considers its exposure to slavery/human trafficking to be limited. Totally PLC and its subsidiaries has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

STEPS

Totally PLC and its subsidiaries has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group are taking the following steps to ensure that modern slavery is not taking place:

- Totally PLC and its subsidiaries are arranging that our staff will undertake on line training in raising awareness of slavery and trafficking.

Once training has been completed Totally PLC and its subsidiaries plan to embed a zero-tolerance policy towards modern slavery.

KEY PERFORMANCE INDICATORS

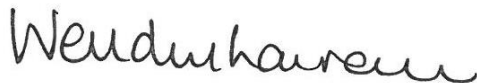
Totally PLC and its subsidiaries has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Totally PLC and its subsidiaries or its supply chains.

- Monitoring the number of new staff who receive training in relation to the requirements of the Act
- Monitoring the instances of current suppliers found to be in breach of requirements relating to the Act

ENSURING COMPLIANCE

Totally PLC and its subsidiaries human resources departments will be responsible for compliance and that these measures has been successfully implemented. Totally PLC and its subsidiaries will review and ratify these provisions on an annual basis.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



Signed

Wendy Lawrence

CEO of Totally PLC