

Modern Slavery Statement

Last updated: April 30th, 2024

I. Introduction

Kooth has a zero-tolerance approach to modern slavery and will act ethically and with integrity in all its business dealings and relationships. As a pioneer and innovator in digital mental health care, Kooth's technology platform and clinical operating model have been developed over 15 years to deliver an integrated, personalised approach to mental health support, providing individuals with access to self-help tools, community-powered peer support, and text-based professional counselling.

Our core purpose is to provide a welcoming service. By that we mean to build and deliver a product that preserves anonymity and removes the barrier of stigma and access. Accessibility is at the heart of our product design and clinical delivery. To provide an effective and personalised service maintaining the trust of service users and the market by ensuring outcomes and evidence for our interventions and to provide a service that can be commissioned for all. We build a service that puts diversity and inclusion at its heart - ensuring that we remove barriers to great mental health services for all people regardless of race, age, gender, sexuality or socioeconomic situation.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out Kooth PLC's strategy to combat modern slavery in any part of our business.

II. Organisational Structure and Supply Chains

Kooth PLC is a digital mental healthcare company, headquartered in the UK and operates in the US. We employ over 580 employees globally.

Our supply chains include large and small technology suppliers based in the UK and worldwide, IT and other office equipment; professional services from our lawyers, accountants and other advisors and office facilities. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

III. Risk Assessment

Due to the nature of Kooth's business and our limited supply chain, we consider the overall risk level of human trafficking and modern slavery to be low. Our supply chain is limited to Europe,

the US and the UK, with no exposure in industries and geographies we consider to be high risk. Within our supply chain, at minimum, we expect vendors to conduct business responsibly, including with respect to compliance with the requirements of applicable slavery, forced labour, child labour and human trafficking laws. We will continue to assess the risks associated with our business and supply chain and expand the scope of our focus, as necessary.

Kooth is not aware of any slavery or human trafficking in any part of our business or supply chain, and no issues were raised during the year ending 31 December 2023. We continue to monitor the safety and security of our platforms and business. In 2023, we became DTAC (Digital Technology Assessment Criteria) Compliant, awarded the ISO 27001:2022 certification and received a SOC 2 Type II attestation report.

IV. Policies and Training

In line with our values and governance arrangements, we ensure we comply with laws and standards in relation to labour practices and human rights, including slavery and human trafficking legislation. We expect everyone at Kooth to understand and display our values to the highest standards, ensuring all employees undertake mandatory training on 'Trafficking and Slavery'. We offer additional material highlighting the risk of modern slavery through courses such as Child Exploitation Intelligence Sharing. We continuously assess the risk of modern slavery occurring in our organisation, our service users and with our suppliers through our procurement process. Our assessment is reinforced by a wide policy framework, including recruitment policy, safeguarding policy and a whistleblowing policy.

Kooth mitigates the risk of modern slavery during recruitment by ensuring all candidates are recruited directly using our robust HR recruitment policies. Measures are in place to ensure all employees have a way of raising concerns about company wrongdoing. Temporary staff are only recruited through established sources who can provide assurance, via the procurement procedures referred to below, that they comply fully with the requirements of legislation relating to the rights and welfare of their candidates and employees.

V. Looking Ahead

This year, we will be submitting our 2024 Commitment of Progress to the UN Global Compact focusing on human rights, labour and anti-corruption principles to remain an active signatory. As

we continue to grow our business in the US, we will ensure that our business complies with laws and standards in relation to labour practices and human rights worldwide.