

Optionis Group Statement on Modern Slavery and Human Trafficking 2022

Introduction

This statement has been prepared for Optionis Group pursuant to section 54(1) of the Modern Slavery Act (the “**Act**”) in respect of the financial year ending 31 October 2022 (“**FY 22**”)

Our Commitment

We recognise that modern slavery is a crime and a violation of fundamental human rights. We are committed to acting ethically and with integrity in all our business dealings and relationships. As part of this commitment, we operate a zero-tolerance approach to modern slavery and human trafficking.

We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business dealings, or in any of our supply chains. In compliance with the Modern Slavery Act 2015, we offer the following statement regarding our efforts to prevent slavery and human trafficking in our supply chain.

Organisational Structure

The Optionis Group is comprised of a number of companies which provide a range of solutions to the United Kingdom’s small business and professions contingent workforce sectors.

This statement covers the activities of each of our following companies:

- Optionis Group Limited.
- Parasol Limited (an umbrella employer providing labour to end-clients in the UK via recruitment agencies).
- Clearsky Contracting Accounting Ltd (tax and accountancy services to small businesses in the UK).
- Clearsky Accountancy and Payroll Limited (tax and accountancy services to small and medium companies in the UK).
- Nixon Williams Ltd (tax and accountancy services to small businesses in the UK).
- SJD Accountancy Limited (tax and accountancy services to small businesses in the UK).
- Brian Alfred Associates Limited (tax rebate services).
- First Freelance Limited (tax and accountancy services to small businesses in the UK).

The above listed companies are collectively referred to as the “**Group**” in this statement.

Through Parasol, the Group provides temporary labour solutions to a number of sectors in the United Kingdom.

The Group and its employees primarily operate in the United Kingdom, with some overseas travel occasionally required by employees from time to time.

We ensure that all employees have the legal right to work in the UK, and are made aware of their statutory rights, such as minimum wage, holiday and sick pay.

Supply Chains

In respect of Parasol, we work with a range of recruitment agencies and end-clients. Recruitment agencies enter into a written agreement with an end-client whereby it is agreed that the agency will source a worker to provide the required services. The worker consequently agrees to be employed by Parasol Limited who in turn enters into a consultancy agreement with the agency to provide the services of the worker.

Furthermore, we procure services and goods from third party suppliers to assist with the operation of our business day to day.

We require our suppliers to comply with the Modern Slavery Act 2015 and to commit to enforcing and maintaining anti-slavery and human trafficking policies.

To reduce the risk of modern slavery in our supply chain, we are committed to only working with reputable agencies. We have stringent due diligence checks for new agencies who wish to be added to our supply chain, which includes background and reputational checks, and these checks are repeated on a three-year basis. Where an agency does not meet our required standards, we do not work with them.

Responsibility

Our Director of Compliance, Alison Roberts, has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries in respect of this policy and ensuring the Group's internal auditing control systems and procedures are effective in countering modern slavery and human trafficking policies.

Policies and Procedures

As part of our commitment to combating modern slavery, we have implemented an Anti-Slavery Policy and Whistleblowing Policy. We also make sure our suppliers are aware of our policies and adhere to the same high standards.

As part of our efforts to monitor and reduce the risk of slavery and human-trafficking occurring in our supply chains, we have adopted due diligence procedures when establishing a relationship with a new supplier/agency or to review ongoing relationships with our current supplier/agencies.

Our procedures are designed to:

- establish and assess areas of potential risks;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains;
- provide adequate protection for whistle-blowers;
- raise awareness of the signs of modern slavery taking place, and how to report them.

Risk and Compliance

The group regularly evaluates the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by carrying out a risk assessments and due diligence exercises.

We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. We require our suppliers to comply with the Modern Slavery Act 2015 and to commit to enforcing and maintaining anti-slavery and human trafficking policies. If we find evidence that any supplier/agency is involved in slavery or human trafficking, we will immediately seek to terminate our relationship with the relevant supplier/agency.

Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measure to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking for our business and supply chains.

Within this reporting period, we have introduced an annual training course that focuses on safe-guarding. All people based managers are required to complete the course. In the training, we raise awareness of safe-guarding and the signs to look out for which may indicate that modern-slavery is taking place. We also train our managers on how to approach and manage such matters.

Incidents relating to the financial year 2022

There were no incidents of Modern Slavery reported by or to The Group in the financial year ending October 2022.

Further actions and sign-off

Following a review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking in the year-end 2023:

- Continue to risk assess the business to ensure that any new risks are immediately addressed.
- Update policies and procedures, where necessary.
- Continue to conduct due diligence procedures on any new and existing supplier/agencies/end-clients.
- Raise awareness of modern slavery risks within the Group and ensure adequate information and refresher training is provided to all our employees.
- Incorporate the Anti-Slavery and Human Trafficking Policy in the induction process for both head office staff and Parasol employees to encourage awareness and reporting of any concerns within the supply chain.
- Create online employee training on Modern Slavery, to ensure that all employees are aware of how and when it may take place, and how to report it, if so.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 October 2022.

This statement was approved by our Chief Executive Officer, Graham Storey on 25th Jan 2023

A handwritten signature in blue ink, appearing to read 'G Storey', with a stylized flourish at the end.

Graham Storey CEO