

Optionis Group Statement on Modern Slavery and Human Trafficking

We recognise that modern slavery is a crime and a violation of fundamental human rights. We have a zero tolerance approach to modern slavery and we are absolutely committed to acting ethically and with integrity in all our business dealings and relationships and 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.

Structure of the organisation

The Optionis Group is comprised of a number of companies:

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

(collectively referred to as the “**Group**”).

The Group provides temporary labour solutions to a number of sectors within the United Kingdom. To find out more about the services that we offer, please click [*insert link to website*].

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

Our supply chain

In order to provide the services, we work with a range of recruitment agencies and end-clients. In particular, 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.

Policies and procedures

As part of our commitment to combating modern slavery, we have implemented an Anti-Slavery Policy and a 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 within 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 risk in our business and supply chains
- 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

Risk and compliance

The Group regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by carrying out 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 measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Further actions and sign-off

Following our 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:

- Conduct further risk assessments to ensure that any new risks are immediately addressed.
- Update policies and procedures, where necessary, in line with the outcome of the risk assessments.
- Introduce contractual provisions which oblige suppliers to comply with the terms of our Anti-Slavery and Human Trafficking Policy.

- Continue to conduct due diligence procedures on any new supplier/agencies/end-clients.
- Refresh staff training.
- 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.

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 2020.

This statement was approved by Doug Crawford on 31 March 2020.

A handwritten signature in blue ink that reads "Doug Crawford". The signature is written in a cursive, flowing style.

CEO