MODERN SLAVERY ACT STATEMENT FOR THE FINANCIAL YEAR 2024 - 2025

Investigo Limited ("the Company") is registered in England and Wales and operates in the UK as a recruitment business specialising in recruiting professionals on a contingent, contracted out and permanent basis for clients in the following sectors: Accountancy and Finance, Actuarial, Business Change and Transformation, Cloud, Data & Analytics, ERP Solutions, Human Resources and Talent Management, Manufacturing, Pharma and Life Sciences, Procurement, Property, Facilities and
Workplace Management, Public Sector Consulting, Risk Compliance and Financial Crime, Strategy and Consulting, Tax and Technology.

INVESTIGO STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING INTRODUCTION:

The Company was established in 2003 and today operates out of offices in the City of London, Guildford, St Albans, Birmingham and Milton Keynes in the UK. The Company currently employs 280 people in the UK but engages, supplies and pays temporary agency workers that number into their thousands through its payroll, in its capacity as a temporary staffing company. The Company turns over in excess of £36 million each financial year and treats the threat of modern slavery as a matter of the utmost importance.

The Company is committed to the highest standards of integrity, transparency and accountability. It is therefore of vital importance to the Company that it can demonstrate that all appropriate steps are taken to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its own business.

STEPS FOR THE PREVENTION OF MODERN SLAVERY:

To hold an individual in slavery is a violation of fundamental human rights and a crime. The Company recognises this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another for the purposes of exploiting them for personal or commercial gain. Accordingly, guidance on how to recognise and respond to the signs of modern slavery is published for the Company's employees on the Company intranet together with the Company's Anti-Modern Slavery Policy which sets out how the Company aims to prevent, detect and report modern slavery in any part of its business or supply chains.

The Company takes a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and in implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its UK business operations or in any of the Company's supply chains. The Company has an internal Training and Development department which is responsible for ensuring all Staff training and development needs are met including around the identification and reporting of concerns around modern slavery. The Company expects the same high standards from its suppliers, contractors and other third parties. As part the Company's contracting processes, it expects that its suppliers will hold their own suppliers to the same standards set out in our policy statement below. The Company asks all suppliers to sign an agreement to confirm this commitment, along with a commitment to train their employees adequately on Modern Slavery risks, how to identify them and report them.

Investigo does not supply workers in the care sector, but does supply into white collar roles in the construction and manufacturing sectors. However we accept that no part of our business is immune to the risk of modern slavery. We appreciate that some parts of our business and their respective supply chains might have a higher risk of modern slavery taking place within them.

Investigo has extensive due diligence processes in place to combat any illegal practices related to slavery and human trafficking in our business and supply chains. For the placement of temporary contractors, Investigo carries out a comprehensive vetting process and routinely requests the following documents from work seekers:

- CV and full employment history
- Right to work and ID documentation
- National Insurance Number or foreign equivalent
- Bank Statement in the name of the individual to be paid
- Proof of address
- Insurance certificates
- References
- Other documents when required by our clients/ local laws

Furthermore, Investigo undertakes extensive due diligence when working with umbrella companies by verifying their company structure, onboarding processes (including reward schemes) and their compliance with local laws including tax laws.

Investigo has an Approved Supplier List in place as it

prefers to work with only the most compliant and professional umbrella companies in the market. This Approved Supplier List is evaluated on a regular basis.

Furthermore, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour and we expect that our suppliers also hold their own suppliers accountable to comply with the same standards. Our consultants furthermore keep in touch with the contractors regularly throughout their assignment to resolve any issues the contractor may have (for example not getting paid by their company).

For candidates who are considered for permanent employment with our clients, we only introduce candidates to our clients if we have received their CV and a confirmation that the applicant has the right to work in the relevant territory and has confirmed their express consent to being put forward for the role. Upon our client's request, we would carry out reference checks to confirm their work history.

All staff and third parties are required to raise any concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains at the earliest possible stage. The Company encourages openness and will support anyone who raises genuine concerns in good faith under its Anti Modern Slavery Policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of the Company's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff believe they have suffered any such treatment, the individual is encouraged to inform either their manager or the People & Culture Team immediately and to report the matter to the proper authorities.

The board of directors has overall responsibility for ensuring this Company's Anti Modern Slavery and Human Trafficking Policy complies with the Company's legal and ethical obligations, and that all those Staff and third parties under its control comply with it and has approved this Statement.

ANTI-MODERN SLAVERY POLICY

1. POLICY SCOPE

1.1 The Company Anti Modern Slavery Policy applies to all persons working for the Company or on its behalf in any capacity, including employees at all levels, directors and officers ("Staff") and third parties including agency workers, customers, suppliers seconded workers, volunteers, interns, agents, contractors, external consultants ("third parties").

2. POLICY STATEMENT

2.1 To hold an individual in slavery is a violation of fundamental human rights and a crime. The Company recognises this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another for the purposes of exploiting them for personal or commercial gain. The Company supplies its services into the following sectors: Accountancy and Finance, Actuarial, Business Change and Transformation , Cloud, Data & Analytics, ERP Solutions, Human Resources and Talent Management, Manufacturing, Pharma and Life Sciences, Procurement, Property, Facilities and Workplace Management, Public Sector Consulting, Risk Compliance and Financial Crime, Strategy and Consulting, Tax and Technology.

2.2 The Company takes a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and in implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its UK business operations or in any of the Company's supply chains. The Company expects the same high standards from its suppliers, contractors and other third parties. As part the Company's contracting processes, it expects that its suppliers will hold their own suppliers to the same standards set out in The Company Anti-Modern Slavery Policy.

2.3 The Company fully supports all national and international efforts to promote ethical principles and work practices and in particular the efforts to prevent exploitation and abuse associated with modern slavery and human trafficking.

2.4 The board of directors has overall responsibility for ensuring the Company Anti-Modern Slavery Policy complies with the Company's legal and ethical obligations, and that all those Staff and third parties under its control comply with it.

2.5 The Company Anti-Modern Slavery Policy does not form part of any employee's contract of employment and the Company may amend it at any time.

3. PURPOSE OF THE POLICY

3.1 The Company Anti-Modern Slavery Policy describes how the Company will prevent, detect and report modern slavery in any part of its business or supply chains.

3.2 The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under the Company Anti-Modern Slavery Policy even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of the Company's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff believe they have suffered any such treatment, the individual should inform either their line manager, the People & Culture department or Legal department immediately. If the matter is not remedied, an employee should raise it formally in accordance with the Company Grievance Procedure, which is published on the intranet.

4. COMPLIANCE WITH THE POLICY

4.1 All staff and third parties must comply with the Company Anti-Modern Slavery Policy and avoid any activity that might lead to, or suggest, a breach of the Policy.

4.2 All staff and third parties are required to raise any concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage. Concerns may also be reported confidentially to 'Unseen' a UK based charity who provide information and guidance about any potential modern slavery issue.

Report Online - unseenuk.org
Helpline – 0800 0121 700

4.3 If any staff believe or suspect a breach of the Company Anti-Modern Slavery Policy has occurred or that it may occur the individual must notify either their line manager, the People & Culture Department or the Legal Team as soon as possible.

4.4 If a concern is raised, the Company will fully investigate the matter to conclusion within 5 working days. The relevant parties will meet within 24 hours of the concern being raised to agree an action plan, including reporting the issue to relevant authorities as required.

4.5 If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, this should be raised as set out in paragraph 5.3.

4.6 All managers are responsible for ensuring that the Company Anti-Modern Slavery Policy and the Company's zero-tolerance approach to modern slavery is communicated to all employees and for ensuring those individuals reporting to them understand and comply with the Company Anti-Modern Slavery Policy and are given adequate and regular training as applicable on the policy and the issue of modern slavery in supply chains.

4.7 Management have day-to-day responsibility for implementing the Company Anti-Modern Slavery Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

4.8 All managers who are responsible for procurement of goods and / or services must ensure that the Company Anti-Modern Slavery Policy and the Company's zero-tolerance approach to modern slavery is communicated to all third parties during the procurement process and / or at the outset of each business relationship.

4.9 Any employee who breaches the Company Anti-Modern Slavery Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct and/or referral to the authorities.

5. SUPPLY CHAIN DUE DILIGENCE

5.1 The Company procures the services of certain UK based suppliers, an up-to-date list of which is retained by the accounts team overseen by the Finance Director. These suppliers provide a range of goods and services to assist the Company's business, including IT and other professional services such as legal and accountancy, stationery supplies and office cleaning services. As part of its due diligence when procuring services, the Company requires each supplier to comply with relevant legislation.

5.2 The Company supplies its services into the sectors listed in point 2.1 of the Company Anti-Modern Slavery Policy. It does not experience regular seasonal surges in demand.

5.3 The Company includes a provision in its standard terms of business with its clients in which each party warrants to the other that it takes all reasonable steps to prevent the exploitation and abuse associated with modern slavery and human trafficking. The Company also requires any supplier

to sign an agreement confirming their commitments to preventing modern slavery.

5.4 The Company may terminate its relationship with other third parties if they breach the Company Anti-Modern Slavery Policy.

5.5 Review of the policy: The Company's UK Legal Department has overall responsibility for reviewing the Company Anti-Modern Slavery Policy.

6. SPECIAL ISSUES RELATING TO THE SUPPLY OF TEMPORARY AGENCY WORKERS

6.1 Company operates in both the permanent and temporary recruitment markets in all the sector disciplines it serves as outlined in Point 2.1 of the Company's Anti-Modern Slavery Policy. When introducing candidates into the direct employment of the client employer the Company operates as an employment agency as defined by the Employment Agencies Act 1973 (as amended). The resulting contractual employment relationship is directly between the candidate introduced by the Company and the employing client who engages them directly and controls their day to day activities as their substantive employer under a contract of employment.

6.2 When supplying a temporary agency worker to client hirers, the Company acts as an employment business as defined by the Employment Agencies Act 1973 (as amended). No worker is charged a recruitment fee and the Company engages the worker supplied into each temporary assignment, under a contract for services. This does not give rise to an employment relationship either between the Company and the temporary agency worker or the client and the temporary agency worker and the temporary agency worker is free to associate with any other recruitment company or employer without interference from the company. The temporary agency worker is not bound to the Company in any way, is not required to give up their identification and right to work documents and the Company checks each worker has custody of their own right to work and identification documents. Every temporary agency worker may terminate his or her engagement on an assignment freely and at any time and for any reason and without threat of violence, intimidation or harassment. The temporary agency worker is not required to work any number of hours per week, is not subject to compulsory overtime and is a 'worker' as defined by the Employment Rights Act 1996. The temporary agency worker is therefore entitled to all 'worker' rights under the employment legislation including, but not limited to, the right to be paid at, at least, the national living wage for all work done, has the right not to have any unlawful deductions made from their wages, has the right to the statutory minimum paid holiday and rest breaks under the Working Time Regulations 1998, has the right to statutory sick and statutory maternity pay, subject to qualification, has the right not to be unlawfully discriminated against and the rights to the protections afforded under the Agency Workers Regulations 2010 and the Conduct of Employment Agencies and Employment Businesses Regulations 2003.

6.3 In the tripartite relationship between the temporary agency worker, the Company and the client, the Company is responsible for managing the administration relating to the engagement of the temporary agency worker. For example, the Company is responsible for paying the temporary agency worker at the agreed rate and at the agreed intervals and for making the required tax and national insurance deductions and contributions in respect of the worker, including pension. Furthermore, the Company is responsible for paying the temporary agency workers it supplies, any statutory sick pay or statutory maternity pay, subject to them qualifying for such payments in accordance with the ordinary qualifying criteria. Both the Company and the client carry a joint responsibility, together with the temporary agency worker themselves, for ensuring the health and safety of the temporary agency worker while on assignment and the client is responsible for supervising and controlling the actual work done by the temporary agency worker during the assignment.

6.4 When supplying a limited company contractor to a hiring client for contracted out services the Company engages such contractor through their personal services company under a contract for services. The contractor is not a worker for the purposes of the Employment Rights Act 1996. The majority of contractors opt out of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 and each contractor enters into a business to business contract for services with the Company.

Nick Baxter
CEO
Investigo

Last reviewed: December 2024