

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 01 January 2022.

Interaction Recruitment PLC ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

Interaction Recruitment PLC is the parent company of the Hexagon Investment Holdings group and has business operations in the United Kingdom.

We operate in the Recruitment sector. The nature of our supply chains is as follows: We work with a number of direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT software and marketing services.

For more information about the Company, please visit our website: <https://www.interactionrecruitment.co.uk/home>.

Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- **Recruitment and selection policy** - We ensure that we are transparent with the "end to end" recruitment process, and can evidence how a worker has applied for a role, and their consent to be submitted for a employment opportunity.

In addition to a robust compliance and right to work process, we also ensure that all workers are UK residents, in credible accommodation and are paid at least national minimum wage. This is all covered within our worker terms and conditions of service document that all temporary workers are provided a copy of once signed.

If team members have a concern or suspect a violation of this policy, we encourage them to speak up immediately. We understand that speaking up can be a difficult thing to do, so we offer reassurance that all information received will be treated seriously and investigated appropriately.

- **Supplier code of conduct** - Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- External supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.

We do not consider that we operate in a high-risk environment because The business operates in this risk level environment because the majority of the supply chain is UK based and in low risk industries such as internet software and support services.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:


- We will contact suppliers to enquire about their modern slavery practices every 12 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.

Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.



Ben Ambler, Director
Interaction Recruitment PLC

01/01/2022

Date