

Modern Slavery and Human Trafficking Statement

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps Tenth Revolution Group (a trading name consisting of Frank Recruitment Group and other UK legal entities), herein “TRG”, has taken and is continuing to take to ensure that modern slavery and human trafficking are not taking place within its business or supply chains.

TRG is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls designed to ensure that modern slavery and human trafficking are not taking place anywhere in its business or supply chains.

Although TRG operates in the IT recruitment sector, which is not generally regarded as a high-risk sector for modern slavery, TRG recognises that risks may nevertheless arise in relation to the use of contingent labour, outsourced services and third-party suppliers, and remains committed to identifying, assessing and addressing such risks.

ORGANISATION’S STRUCTURE

TRG is an award-winning, multi-brand specialist global recruitment firm delivering permanent and freelance niche technology experts to vendor channel partners and SME and enterprise organisations across the globe.

OUR BUSINESS

Our business consists of IT recruitment, specifically across the following technologies:

- Microsoft Dynamics and Stack;
- Salesforce;
- NetSuite;
- ERP, ServiceNow;
- Java, web and mobile; and
- Big Data and SAS

OUR SUPPLY CHAINS

Our supply chains include the sourcing of independent contractors for clients, as well as suppliers relating to facilities, business support, professional services and IT infrastructure.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

TRG maintains an Anti-Slavery and Human Trafficking Policy which reflects its commitment to preventing modern slavery and human trafficking in its business and supply chains. That policy is supported by related policies and procedures, including whistleblowing, recruitment, right to work, equal opportunities and supplier onboarding processes, as applicable.

TRG expects its suppliers, contractors and other business partners to comply with all applicable anti-slavery and human trafficking laws and regulations, including the Act, and, where appropriate, to maintain and enforce their own policies and procedures designed to prevent modern slavery and human trafficking in their organisations and supply chains.

In addition to compliance with its internal policies, TRG seeks to address modern slavery risks contractually, including through appropriate terms of business, supplier obligations, warranties, termination rights and, where considered appropriate, indemnities.

DUE DILIGENCE PROCESSES

TRG applies due diligence processes which are proportionate to the nature of its business and the level of risk presented by a particular relationship or supply chain.

These processes may include, where appropriate:

- undertaking compliance checks on independent contractors before permitting them to commence an assignment with a client;
- conducting right to work and identity checks;
- assessing suppliers during onboarding and renewal processes;
- seeking contractual commitments regarding compliance with applicable anti-slavery laws; and
- investigating concerns raised through internal reporting channels or otherwise brought to TRG's attention.

RISK ASSESSMENT AND RISK MANAGEMENT

TRG recognises that the principal areas of potential risk may arise through the engagement of contingent workers, the use of intermediary suppliers and the procurement of operational support services.

To manage these risks, TRG adopts a risk-based approach to its supply chain oversight and internal controls, including periodic review of supplier relationships and escalation of any matters of concern for further investigation.

WHISTLEBLOWING

TRG has implemented a Whistleblowing Policy under which employees and, where applicable, other workers may report concerns or suspected wrongdoing, including concerns relating to modern slavery or human trafficking.

TRG aims to ensure that any person making a report in good faith is treated confidentially, so far as possible, and is not subjected to retaliation for raising a genuine concern.

TRAINING

TRG provides training to relevant staff to ensure they understand the risks of modern slavery and human trafficking and know how to identify and escalate potential concerns.

This training includes:

- awareness of modern slavery and human trafficking; and
- specific training for recruitment staff on identifying and reporting potential cases.

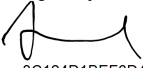
EFFECTIVENESS AND ONGOING REVIEW

TRG continually reviews the effectiveness of the steps it takes to prevent modern slavery and human trafficking and will update its policies, procedures and training where appropriate.

TRG intends to keep its approach under regular review in light of the nature of its business, developments in applicable law and guidance, and any issues identified through its internal monitoring and reporting processes.

APPROVAL

This statement is made for the financial year ending 30 November 2025 and has been approved by the appropriate governing body of TRG.

Signed by:

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James-Lloyd Townshend
Tenth Revolution Group