

## Modern Slavery Act Transparency Statement for financial year ending 30 September 2022

The IntegraFin Holdings plc group of companies which includes IntegraFin Holdings plc, Integrated Financial Arrangements Ltd, IntegraLife UK Limited, IntegraLife International Limited, IntegraFin Services Limited, Integrated Application Development Pty Ltd, Objective Asset Management Limited and Time For Advice Limited are together referred to as 'IntegraFin Group' for the purposes of this statement.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act') and sets out the steps that the IntegraFin Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

At the IntegraFin Group we do not tolerate modern slavery, servitude, human trafficking or forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to having effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or its supply chain.

The IntegraFin Group provides a general investment facility, individual savings account and self-invested personal pension wrappers along with custody & transaction services to retail financial investors through the Transact platform, which is operated by Integrated Financial Arrangements Ltd. In addition the Group offers an insured SIPP and both onshore and offshore investment bonds via its subsidiary insurance companies. It also provides systems and support services to financial advisers via its subsidiary, Time For Advice Limited.

We have taken the following steps to prevent any slavery or trafficking:

- Our recruitment policy includes conducting eligibility-to-work checks for all employees to safeguard against human trafficking and individuals being forced to work against their will.
- To identify and manage the risk of modern slavery and enforced labour in our supply chain we operate anti-bribery and corruption, anti-money laundering and suspicious activity reporting policies.
- We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated or practices within our business or supply chain without fear of reprisals.

- In addition to the whistleblowing policy, we offer employees the opportunity to seek independent and impartial advice via confidential telephone, email and/or face-to-face counselling services provided through our employee assistance programme, should they wish.
- Staff employment contracts and handbooks explain the manner in which we behave as an organisation and how we expect our employees to act.
- The majority of our suppliers are based in the UK and supply standard goods or services that are low-risk for modern slavery. In addition, we aim to hold regular supplier relationship management meetings and regular service reviews with core suppliers, at which risk concerns are raised and addressed. We expect all suppliers to comply with the Act in their daily business and when performing services for us. We have taken the following steps to assess and manage any risk that our supply chain may use forced labour:
  - When entering into arrangements with suppliers, we are alert for any indicators of forced labour.
  - We impose specific contractual obligations in contracts with significant suppliers under which they warrant that their business complies with prevailing law.
  - We expect our direct suppliers to impose equivalent obligations on their own suppliers.

This Modern Slavery Act Transparency Statement has been agreed and approved by the Board of Directors of each company in the IntegraFin Group that employs staff or engages suppliers.

### Approval for this statement

This statement was approved by the Board of Directors of IntegraFin Holdings plc on 23 March 2022 for and on behalf of the IntegraFin Group of companies.

**Alexander Scott,**  
**CEO**

31 March 2023