

The Modern Slavery Act 2015 (MSA) consolidates previous UK legislation concerning slavery, servitude, and human trafficking offences. The term 'modern slavery' encompasses a number of different offences but, in general, it refers to a situation in which ownership is exercised over a person or where individuals are coerced into providing their services or do so under threat of a penalty. The term 'human trafficking' covers arranging or facilitating the travel of individuals with a view to exploiting them. The MSA is intended to strengthen successful prosecution against offenders while offering enhanced protections for victims.

We recognise that organisations can be implicated in modern slavery both directly and indirectly in a variety of ways - in their own operations, through their global supply chains and through their involvement with business partners.

As an FCA regulated insurance intermediary firm based in the UK and dealing with UK customers, we are part of various supply chains involving relationships with insurers, credit facilitators, other intermediaries and service providers. This enables us to offer professional services to private individuals and commercial clients.

We are committed to the principles of the MSA and seek to ensure that there is no modern slavery or human trafficking in any part of our business or supply chains. This is reflected in our commitment to:

- act with integrity and to act ethically in all our business and relationships
- ensure our board, senior management and employees at all levels are aware of the principles of the MSA
- regularly review at board/senior management level the potential for human trafficking and slavery in our own business and that of our business partners
- maintain fair recruitment procedures and conditions of employment
- inform all staff of appropriate action to take if they suspect any slavery or human trafficking
- employ whistleblowing procedures which allow any MSA concerns to be raised

We have similar expectations of suppliers, customers, business partners and others who are directly linked to our business operations, products and services.

Any MSA issues identified are referred to the Board of Directors for urgent review.