



MODERN SLAVERY STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act ("the Act") and sets out the measures that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chains.

The Society

We are a mutual financial services organisation offering income protection insurance to individuals across the UK. All of our business is conducted within the UK

We employ around 70 staff and operate from offices in Cirencester.

Risks Identified

Our supply chains are relatively simple, and the nature of the goods and services procured provides only limited opportunities for modern slavery and/or human trafficking practices. We do not act as a producer, manufacturer or retailer of physical goods and we have no supply chain in relation to such activities.

Our supply chains include:

- Office services, equipment, furniture or consumable supplies
- Marketing and promotional literature and/or merchandise
- IT and electronics equipment and/or services

Policies

Given the nature of what we do, it is considered that there is a low risk of modern slavery and/or human trafficking having a connection with our business activities, however we have taken, amongst others, the steps detailed below to ensure compliance with the Act.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 1. Recruitment Policy:** We operate a robust Recruitment Policy and proper hiring procedures, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We are committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform.
- 2. Whistleblowing Policy:** We operate a Whistleblowing Policy so that all employees know that they can raise concerns about unfair treatment of colleagues or practices within our business or the businesses of our suppliers, without fear of reprisals or repercussions.
- 3. Procurement and Outsourcing Policies:** We implement a Procurement Policy which operates in conjunction with its contract review and outsourcing policies and which includes full due diligence checks on all material suppliers.

Suppliers

We have undertaken a review of our procurement processes and have identified opportunities to embed both the assessment and reduction of risks of modern slavery and/or human trafficking in our supply

chain into our operations. The procurement process now requires due diligence to be conducted on all new material suppliers before allowing them to become a supplier.

Effectiveness

We will monitor the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chains.

Approval for this statement

This statement was approved by the Board of Management on 07 February 2019

**A J Horsley
Company Secretary & Head of Compliance**