

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 by The Somerset Bridge Group and constitutes the Group's slavery and human trafficking statement for the current financial year. Future statements will be updated and published annually within 6 months of our financial year-end.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business, including in our supply chains. We are resolved to act ethically and with integrity in all our business relationships and are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

We have a Code of Ethics that everyone at The Somerset Bridge Group is required to display and we expect our partners and suppliers to adopt. These values include being fair to everyone who works for us and with us.

### **1. ORGANISATIONAL STRUCTURE**

The Somerset Bridge Group (SBG) is made up of three companies: Somerset Bridge Limited, Somerset Bridge Insurance Services Limited and Somerset Bridge Shared Services with a combined staff head count of over 500.

At Somerset Bridge Group we aim to build a sustainable and innovative business focused on underwriting, broking and claims handling of UK motor insurance, offering transparent products and an efficient and fair service to our policyholders.

### **2. KEY PARTNERS AND SUPPLY CHAIN**

SBG works with several key partners and suppliers:

**Debenhams** is a leading international, multi-channel brand with a proud British heritage. Debenhams publishes its own Modern Slavery Statement which can be found at <http://sustainability.debenhamsplc.com/wp-content/uploads/Final-ch-11-07-10-16.-Debenhams-Modern-Slavery-Statement-2016-Copy-2.pdf>.

**Outworx** handles the policy administration for many of our brands in South Africa. These include Go Skippy, Vavista and Debenhams.

**Southern Rock Insurance Company Limited** is a regulated insurer based in Gibraltar which underwrites insurance policies in the UK.

**Legal Protection Group Limited** is an appointed representative of SBG and a specialist provider of Before-the-Event and After-the-Event legal protection insurance.

As well as these key partners, SBG works with a number of major insurers in the UK who are members of the SBL insurer panel.

### **3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We have implemented internal policies to ensure compliance with legislation and best practice, including the following:

- Abusive and Unacceptable Behaviour Policy

- Anti-harassment and Bullying Policy
- Equality and Diversity Policy
- Treating Customers Fairly Policy
- Code of Ethics
- Anti Bribery and Corruption
- Values and Behaviours
- Health & Safety Policy
- Whistleblowing Policy
- Recruitment checks - Employment References and checks

These policies encourage ethical behaviour and respect for human rights throughout our organisation and supply chain. Policy compliance is monitored by our HR, Risk, Compliance and Legal teams with oversight by the senior management team and the Board.

#### **4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

We conduct ongoing due diligence on our panel of insurers which is reviewed by our Audit Risk and Compliance Committee.

We work closely with Outworx, with directly employed staff working in offices in South Africa, and our senior management regularly attending their offices to audit compliance with policies and processes.

We have in place systems for staff to report any concerns and to protect whistle blowers.

As part of our ongoing compliance and risk monitoring exercises, both internally within the group and in relation to monitoring third parties, we are developing key indicators to identify and assess areas of potential risk in our supply chains. We can take steps to mitigate any risk of slavery and human trafficking occurring in our supply chains and monitor on an ongoing basis.

#### **5. SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking and we expect the same approach from all of our partners and suppliers. We encourage our partners and suppliers to take the same ethical approach to business as we do. We include provisions in our key contracts that our partners and suppliers should adhere to our policies.

#### **6. TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking and now provide our staff with access to [www.antislavery.org](http://www.antislavery.org) so they understand the key provisions of the Modern Slavery Act, how to recognise slavery practices and report them to the police or local enforcement bodies. This includes making employees aware of the Modern Slavery Helpline (telephone number: 0800 0121 700).

#### **7. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

As a regulated business, we maintain a high standard of risk management, auditing and compliance monitoring in order to protect our customers. We apply the same standards to ensuring that we conduct business ethically, including combating slavery and human trafficking.

**Reviewed & Approved by: Elizabeth Bilney, CEO, Somerset Bridge Insurance Services Limited**

**Dated:** 22/10/20

**Approved by the Board:** 23/10/20