

SOMERSET BRIDGE GROUP

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2021

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 which include values that everyone at The Somerset Bridge Group is required to adhere to and we expect our partners and suppliers to adopt these. 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 subsidiary companies: Somerset Bridge Limited (SBL), Somerset Bridge Insurance Services Limited (SBISL) and Somerset Bridge Shared Services Limited (SBSSL) with a combined staff head count of over 500.

At Somerset Bridge Group we strive to be an innovative, customer focussed insurance group; providing an excellent experience through collaboration and constantly delivering value.

2. KEY PARTNERS AND SUPPLY CHAIN

SBG works with several key partners and suppliers including a number of major insurers who are members of our broking panel, software houses and premium finance companies. All are subject to appropriate due diligence to ensure Modern Slavery principles are followed.

Outworx handles the policy administration for many of our brands in South Africa. These include Go Skippy, Go Skippy 4 Business and Vavista. The principles set out in the Modern Slavery Policy are embedded as part of South African legislation which include but are not limited to; the Basic Conditions of Employment Act, The Labour Relations Act, The Constitution of the Republic of South Africa, The Financial Intelligence Centre Act, The Prevention of Organised Crime Act, and the Protection of Constitutional Democracy against Terrorism and Related Activities.

3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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

- Anti-harassment and Bullying Policy
- Equality and Diversity Policy
- Treating Customers Fairly Policy
- Code of Ethics
- Anti-Bribery and Corruption
- 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 Risk and Compliance Committee and request all firms to provide a copy of their Modern Slavery Policy as part of due diligence.

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 committed to maintaining the current standard of due diligence on our suppliers and provide staff with avenues to report concerns. We can take steps to mitigate the risk of slavery and human trafficking occurring in our business, supply chains and monitor on an ongoing basis. We aim to achieve greater transparency, by being open and clear in the way we communicate in our reporting, including our modern slavery statement.

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. In light of the disruption caused by the Coronavirus pandemic, we have continually reviewed and adapted our approach throughout the year and will continue to do so in the future in order to continue to deliver against our priorities.

6. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking our staff undertake annual, mandatory training. We also provide our staff with access to 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). The following KPIs demonstrate some of the activities, efforts and progress made in 2021:

Risk Assessment Key Performance Indicators
100% of SBG employees completed annual mandatory training on the Modern Slavery Act
ZERO speak up cases related to Modern Slavery or related issues
100% New starters complete Modern Slavery training at induction

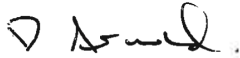
We will continue to develop and improve our approach to respecting human rights and preventing modern slavery.

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.

The boards of the Somerset Bridge Group entities identified within scope, as well as the Somerset Bridge Insurance Services Ltd board have reviewed and approved this statement.

The CEO of Somerset Bridge Group Limited has signed the statement on behalf of the Board of Directors.



Damian Arnold

OCTOBER 2022