

## **SOMERSET BRIDGE GROUP**

### **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2024**

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. This statement was approved by the Somerset Bridge Group Ltd Board on 30 August 2024.

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 Conduct which include values that everyone at The Somerset Bridge Group is required to adhere to and employees are expected to report their concerns and management to act upon them. 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 Somerset Bridge Group Limited and its 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 focused 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. 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 seek to include provisions in our contracts with key partners and suppliers that they will adhere to all legal requirements regarding modern slavery and human trafficking.

Outworx, based in South Africa, handles the policy administration for many of our brands. These include GoSkippy 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
- Code of Conduct
- Anti-Bribery and Corruption Policy
- Health & Safety Policy
- Whistleblowing Policy
- Recruitment checks - Employment References and checks

- Procurement Policy

These policies encourage ethical behaviour and respect for human rights throughout our organisation and supply chain. Policy compliance is monitored by our Human Resources, 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 Executive 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 systems in place for staff to report any concerns and to protect whistleblowers.

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. We 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

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.

All new suppliers are required to complete our due diligence questionnaire, confirm that they comply with modern slavery laws and provide a copy of their modern slavery policy and/or statement.

#### 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](http://www.antislavery.org) so they understand the key provisions of the Modern Slavery Act, how to recognise slavery practices and report them.

#### 7. KPIs

We continue to develop and improve our approach to respecting human rights and preventing modern slavery. The following KPIs demonstrate the ongoing efforts and the additional measures put in place:

Key Performance Indicators		
2023 KPIs	Target	Achieved

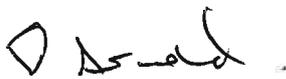
Annual Mandatory Training on Modern Slavery Act	100%	100% of SBG employees completed annual mandatory training on the Modern Slavery Act
New starters completion of Modern Slavery Training	100%	100% new starters complete Modern Slavery training at induction
Employees made aware of Modern Slavery Helpline (incl. within training)	100%	100% of employees made aware of Modern Slavery Helpline via our training
<b>Complaints &amp; Incidents</b>		ZERO speak up cases related to Modern Slavery
<b>2023 Improved Oversight &amp; Control</b> 2023 KPI Performance report submitted to the Board July 2024		
<b>2024 Extending our commitment through our Supplier and Partners</b> <ul style="list-style-type: none"> <li>Targeted training to be put in place for those involved with procurement</li> <li>100% - all new suppliers and partners are required, through supplier and partner due diligence process, to confirm that they comply with modern slavery laws and to provide copies of their modern slavery policy and statement, and anti-modern slavery clauses are included within all new supplier contracts</li> <li>Review of all existing supplier and partner contracts, with variations of contracts to include anti-modern slavery clauses where there are none – expected to be substantially completed during 2025</li> </ul>		

## 8. OUR EFFECTIVENESS IN COMBATting 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 combatting slavery and human trafficking.

The Somerset Bridge Group Board is identified as within scope and has 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**

**August 2024**