

## Modern Slavery Statement 2018

This statement (“Statement”) is made pursuant to Section 54 of the Modern Slavery Act 2015 (“Act”) in respect of the companies that exist within the esure Group (“Group”). This Statement describes the steps which we have taken during the financial year ended 31 December 2018 to ensure that slavery and human trafficking is not taking place in any part of our own business or supply chains.

We actively work with authorities to support their actions against modern slavery related crimes and require both our employees and wider network to engage collectively to combat modern slavery and human trafficking.

### Our business

The Group is an efficient, customer focused personal lines insurer, founded in 2000 by Chairman, Sir Peter Wood, Britain’s foremost general insurance entrepreneur. The Group is one of the UK’s leading providers of Motor and Home insurance products through the esure, Sheilas’ Wheels and First Alternative brands.

Customers are able to purchase our products online, either direct or through price comparison websites, over the phone, or through the use of our brokerage network.

We have over 2,000 employees in the UK across our three sites in Reigate (head office), Manchester and Glasgow.

### Review of our work in 2018

- Enhanced the role of the modern slavery compliance team

Last year, the Group created the esure modern slavery compliance team (“MSCT”). This is a specialist team made up of representatives from Legal, Risk, Procurement and HR departments, created to identify and implement changes within the Group to combat modern slavery. This year, the MSCT helped to concentrate endeavours in preventing modern slavery through providing a structured framework and plan for the Group to adopt in the coming years.

- Updated our external policy used to tackle modern slavery

Our Code of Business Ethics, distributed to our new suppliers, which incorporates the Group’s values and ethos was updated to include references to modern slavery law and compliance, ensuring that there is a consistent approach to tackling modern slavery with our wider network.

Similarly, our Procurement Policy, which sets out the expectations of our suppliers, includes a strict adherence to our Code of Business Ethics. A supplier’s compliance with the Code is paramount to us forming or re-entering into an existing relationship.

We strive to encourage the right behaviours by fostering long term relationships with our suppliers and, for example, by encouraging minimum standards to be met such as paying (at least) the real UK Living Wage for suppliers who provide us with additional resource in servicing our customers.

- Reviewed and updated our current Risk Assessment

Each year we update and maintain our modern slavery risk assessment which was created to identify and investigate changes in risks raised in new business processes. After engagement with several stakeholders, changes were made to align them with our updated policies for both employees and suppliers.

- Provided specialised training for key esure employees

In 2018, esure conducted specialised training for key departments in the business including Procurement and Facilities. This training helped to bring more attention to the nature of operations that exist within our supply chains and wider network.

It is important to us that all our employees feel comfortable to voice their concerns. Last year we sent all employees an internal news update outlining the basics of modern slavery, as well as a 'beginner's guide' to identifying and reporting potential cases. We also provided employees with contacts and references to wider organisations, along with links to our internal and external policies.

#### What we intend to do next

We understand that tackling modern slavery is an ongoing process. With that in mind, we have outlined our steps in 2019:

- Extend our training programme to a wider range of staff including supplier managers and those closer to our repairer network.
- Continue to review and assess our annual modern slavery risk assessment to identify any new risks which arise in the business.
- Conduct more onsite visits with key suppliers to better understand the nature of their business and employee conditions.
- Monitor changes to legislation regarding modern slavery.

#### Approval

This Statement was approved by the Board of Directors of esure Group plc on 04 April 2019.



Darren Ogden  
Interim Chief Executive Officer  
**esure Group plc**

04 April 2019