

## esure Group Modern Slavery Statement 2021

### Introduction

This Statement sets out the steps taken by esure Group plc, esure Services Limited and esure Insurance Limited, (together, “**esure Group**”), pursuant to section 54 of the Modern Slavery Act 2015. This Statement covers the financial year ended 31 December 2021.

Our directors and senior management take this topic very seriously and are committed to continue to maintain strong, robust policies and protocols which seek to prevent modern slavery and human trafficking from taking place within our own business or supply chain. We understand our responsibility as a business to assist the authorities in any way we can with the collective support of our employees, suppliers and our wider network.

### Our Business

esure Group plc is the holding company for a group of companies including esure Services Limited and esure Insurance Limited.

The Group provides motor and home insurance products and ancillary services through the esure, Sheilas’ Wheels and First Alternative brands.

Customers are able to purchase our products online, either direct or through price comparison websites, or over the phone. The Group operates UK call centre operations and has outsourced arrangements in the UK to supplement this operation. At the end of 2021, the Group employed 1678 people in the UK, across our three sites in Reigate (Head Office), Manchester and Glasgow.

### Our Supply Chain

The Group is committed to working in a responsible, sustainable and inclusive manner, ensuring all colleagues are valued and treated with respect and our customers are at the heart of what we do. We expect our suppliers to operate in a similar way and during 2021 we issued a new Supplier Code of Conduct to reinforce this approach.

The Code incorporates the Group’s values and ethos, and includes references to modern slavery legislation and compliance, ensuring that there is a consistent approach to tackling modern slavery across our supply chain. Our procurement procedure requires confirmation from any prospective supplier that they will abide by the esure Group Supplier Code of Conduct.

In compliance with our Outsourcing Policy, activities are undertaken based upon an assessment of the risks associated with the services to be supplied and/or the supplier. This may include:

- understanding the geographical location from where the supplier’s services will be performed;
- ensuring that we have a right to conduct audits of the supplier;
- requiring our prior approval to the supplier’s use of any subcontractors; and
- reviewing the supplier’s vetting process.

A risk-based assessment of esure Group’s suppliers is conducted to define appropriate levels of oversight throughout the contract life cycle, including the frequency with which checks are undertaken.

esure Group's Supplier Relationship Management procedure requires each supplier to be assigned a Supplier Manager who is responsible for ongoing oversight of the supplier's performance and its compliance with esure Group's policies and procedures.

### Our Policies

- **esure Group Supplier Code of Conduct** sets out the Group's values and ethos and we expect each company or individual that we do business with to adhere to. It makes explicit reference to modern slavery legislation and is part of our commitment to making sure that slavery and human trafficking is not taking place in any part of our own business or supply chain
- **Employee Code of Conduct** includes a section that highlights the issues surrounding modern slavery and human trafficking, how to report any suspected cases, and the expectations that all colleagues shall operate in a manner that protects human rights.
- **Whistleblowing Policy** encourages any employee, former employee, agency staff, contractor or 3rd party supplier staff who has any concerns or discovers information which they believe shows malpractice or wrongdoing including modern slavery incidents, to let us know about it without worry. This policy outlines how those concerns or suspicions can be raised without fear of reprisal, even if they turn out to be mistaken.
- **Outsourcing Policy** this reflects the rigorous regulatory regime that applies to us as an insurance company and includes requirements such as the need to carry out due diligence on potential service providers and their ability to comply with applicable rules, regulations and industry standards.
- **Equity, Inclusion and Diversity Policy** while this policy is not related to slavery and human trafficking issues, we are committed to promoting equity, inclusion and diversity in the workplace. We celebrate and nurture our diversity because we want to create an environment where people from all backgrounds and beliefs feel respected, are treated equally and can thrive.

### Our Recruitment Process

We conduct pre-employment checks to verify the identity and background of anyone recruited to work for us. Our screening also ensures all employees have the right to work in the UK.

### Our Training

esure Group uses its MyLearning platform to provide training on the following subjects:

- **Modern Slavery** This biennial training is mandatory and new starters take this module within 3 weeks of their start date.
- **Whistleblowing** This annual training is mandatory and new starters take this module within 3 weeks of their start day.

- **Code of Conduct** This annual training is mandatory and new starters take this module within 3 weeks of their start day.

### Anti-Slavery Day and Colleague Engagement Initiatives

On the 18 October 2021 we joined the UK national campaign to mark Anti-Slavery Day and used our internal website to provide employees with practical information about how to spot and report modern slavery and human trafficking.

We use an external company to facilitate colleague engagement. They provide dedicated software that is ‘continually listening’, enabling us to run frequent surveys throughout the year and to receive and act upon feedback quickly.

### Governance and Risk Assessment

Our Modern Slavery Compliance Team, which includes representatives from the Legal, Risk, Procurement and HR departments, continue to review and assess our annual Modern Slavery Risk Assessment to identify any risks which arise in the business and generate strategies to prevent modern slavery and human trafficking from taking place within our business or our supply chain.

### Key Performance Indicators

The KPIs below summarise some of the activities, efforts and progress we made during 2021:

Number of cases of modern slavery incidents identified	0
Number of modern slavery incidents reported by our employees or suppliers	0
Percentage of new esure Group employees who received Anti-Slavery training	98%
Percentage of esure Group employees who received Whistleblowing training	99%
Percentage of esure Group employees who received Code of Conduct training	99%
Percentage of new suppliers that have agreed to the esure Group Supplier Code of Conduct	100%

### Approval

This Statement was approved by the Board of Directors of esure Group plc on 30 March 2022.



David McMillan  
**Chief Executive Officer**  
 esure Group plc  
 30 March 2022