

## esure Group Modern Slavery Statement 2020

### 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 2020.

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 2020, the Group employed 1764 people in the UK, across our three sites in Reigate (Head Office), Manchester and Glasgow.

### Our Supply Chain

Our procurement procedure requires confirmation from any prospective supplier that they will abide by the esure Group Code of Business Ethics. 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.

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:

- reviewing the supplier’s HR vetting process;
- understanding where the supplier’s services will be performed from, i.e. within the UK, or any other country;
- implementing an approval process with the supplier for their use of subcontractors prior to use; and
- ensuring that we have a right to conduct audits of the supplier.

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 Code of Business Ethics** outlines standards that we expect each company or individual that we do business with to adhere to. We expect respect for Human Rights. The Group is subject to both the European Convention on Human Rights and the UK Human Rights Act 1998 and we are committed to making sure 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.
- **Whistleblower 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** was updated this year to include suitability checks for our service providers including due diligence on modern slavery and their ability to demonstrate certified adherence to recognised, relevant 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 and Development

Through our MyLearning platform esure Group provided in 2020 the following online training:

- **Anti-Slavery:** esure launched this new mandatory training in October 2020 for all employees to be completed every two years.
- **Whistle-blower online module:** This annual training is mandatory and new starters take this module within 3 weeks of their start day.
- **Code of Conduct training:** This annual training is mandatory and new starters take this module within 3 weeks of their start day.

### Our Anti-Slavery Campaign and Colleague Engagement initiatives

- On the 18<sup>th</sup> October 2020 we again joined the UK national campaign to mark Anti-Slavery Day. Via our internal website we provided employees with practical information about how to spot and report modern slavery and human trafficking and launched our Anti-Slavery awareness online training which received very positive feedback.
- As part of our 2020 company objectives, we partnered with an external company to modernise colleague engagement. This new tool uses engagement 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 (“MSCT”), 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 - 2020

The KPIs below summarise some of the activities, efforts and progress we made this year:

Number of cases of modern slavery incidents identified	0
Number of modern slavery incidents reported by our employees or suppliers	0
Percentage of esure Group employees who received Anti-Slavery training	96%
Percentage of esure Group employees who received Whistleblowing training	97.1%
Percentage of esure Group employees who received Code of Conduct training	99.2%
Percentage of suppliers that have agreed to the esure Group Code of Business Ethics since amended to include anti-slavery obligations in 2018	100%

### Approval

This Statement was approved by the Board of Directors of esure Group plc on 30 March 2021.



David McMillan  
**Chief Executive Officer**  
 esure Group plc  
 30 March 2021