

esure Group Modern Slavery Statement 2019

Introduction

This Statement set out the steps taken by esure Group plc, esure Services Limited and esure Insurance Limited, (together, the "Group"), pursuant to section 54 of the Modern Slavery Act 2015. This Statement covers the period during the financial year ended 31 December 2019.

It is our aim to introduce and 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. In 2019, the Group employed over 1,800 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.

Activities are undertaken based upon an assessment of the risks associated with the services 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; or
- ensuring that we have a right to conduct audits of the supplier.

A risk-based segmentation assessment of esure suppliers is conducted to define appropriate levels of oversight throughout the contract life cycle including the frequency with which checks are undertaken to ensure ongoing compliance by the supplier.

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

Our Human Resources

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.

Updates to Policies

Building on from our review of internal and external policies last year, our Employee Code of Conduct, which sets out the expectations we have of our employees, has been updated to provide a greater emphasis on the issues surrounding modern slavery and human trafficking. Through this, we've strengthened the need for our employees to work collectively to identify and report any activities which they suspect are contrary to the Modern Slavery Act.

Training & Development

Classroom training: In accordance with initiatives highlighted in our previous statement, we have successfully extended our training programme to a wider range of staff including supplier managers and those closer to our approved network of repairers. In 2019, we delivered modern slavery awareness training to our motor repairer relationship management team, providing guidance on how to spot the signs of exploitation and how to successfully report potential cases. By providing this training, we've strengthened our lines of communication to those employees closest to our approved network of repairers.

Online Training: All employees and contractors are required to complete our Whistle-blower online module annually and new starters take this module within 3 weeks of their start day. The module provides information on how to report potential or actual incidents. In 2019, the module was completed by 1937 colleagues.

Anti-Slavery Day awareness campaign: On the 18th October 2019 we joined the UK national campaign to mark Anti-Slavery Day. Via our internal website and employee newsletter we provided employees with practical information about how to spot and report modern slavery and human trafficking.

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.

there were no incidents relating to modern slavery or human trafficking identified during the year ending 31 December 2019, nor were there any incidents reported by our employees or suppliers.

Approval

This Statement was approved by the Board of Directors of esure Group plc on 1 April 2020.

A handwritten signature in black ink, appearing to read 'David McMillan', with a stylized flourish at the end.

David McMillan
Chief Executive Officer
esure Group plc
1 April 2020