

SLAVERY & HUMAN TRAFFICKING STATEMENT

INTRODUCTION

We are a provider of insurance in the UK financial services sector and are the parent company of the esure Group (Group). We are committed to the highest standards of ethics and integrity and are dedicated to conducting our business in a lawful manner, which includes engaging with suppliers to ensure that they share our high standards.

As required by the Modern Slavery Act 2015 (the Act), this statement describes the steps which the Group has taken during the financial year ended 31 December 2017 to ensure that slavery and human trafficking is not taking place in any part of our own business or supply chains.

RISK MONITORING AND COMPLIANCE

As part of our initiative during 2017 we have carried out a risk assessment to identify potential areas of risk in our business and supply chains.

Our risk assessment takes account of the country, sector, transactions and partners of the business. We identified that the overall risk of the esure Group facilitating modern slavery was low. We have acknowledged in our assessment that the following areas of our business have a slightly higher level of risk:

- Non-UK service staff;
- On-site service providers (such as catering, security and cleaning staff); and
- Off-site service providers (such as repairers and loss adjustor services carried out by third parties).

As part of the action taken by esure in 2017, we have formed a Modern Slavery compliance team, made up of representatives from Legal, Risk, Procurement and HR departments. This compliance team is responsible for identifying and implementing changes within the Group to combat modern slavery, including:

- Maintaining and updating the modern slavery risk assessment annually;
- Investigating risks raised in the risk assessment; and
- Implementing changes in the business to combat modern slavery risks which have been identified.

OUR POLICIES

Our Code of Conduct sets out our core principles of our business ethics and demonstrates our commitment to fair employment practices in relation to our own employees.

We also have a Code of Business Ethics (Code) and a Whistleblowing Policy and these standards and principles are embedded in our day-to-day activities and are covered in inductions for new staff and are reinforced through staff training. All employees undergo pre-employment vetting.

We expect our suppliers to have fair employment practices too and our Procurement Policy sets out the expectations of our suppliers, which includes adherence to our Code. A supplier's compliance with our Code is an important factor in forming or re-entering into a new relationship with a supplier and we carry out due diligence on our suppliers through the ongoing supplier

management processes we have in place. Any breach of our Code may result in us terminating our arrangements with the supplier.

OUR SUPPLY CHAIN RELATIONSHIP

Key suppliers to the Group are the businesses which help us to run our premises and operations, which includes our catering and cleaning providers as well as, for example, our call centres, repairer networks and loss adjusters.

This year we have incorporated clauses in our contracts with our existing repairers to create contractual obligations on repairers to comply with the Act. These clauses are also incorporated into our standard terms for all new repairer agreements.

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 voluntary UK Living Wage.

RISKS AND COMPLIANCE

We are committed to buying quality products and services from trusted suppliers and price is not our only driver. We meet formally with our key suppliers on a regular basis and also occasionally visit them at their own premises. This enables us to observe first hand their working conditions and have the opportunity to speak to workers directly. We have a contractual right to audit the performance and working practices of our suppliers in many cases, and monitor overall compliance with the Code.

APPROVAL

This statement was approved by the Board of Directors of esure Group plc on 6 March 2018.



Darren Ogden
Interim Chief Executive Officer
esure Group plc

6 March 2018