

## esure Group Modern Slavery Statement 2024

### 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 2024.

Our directors and senior management take this subject very seriously. They are committed to maintaining 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. The Group operates UK call centre operations and has outsourced arrangements in the UK and South Africa to supplement this operation. At the end of 2024, the Group employed 1087 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. These values are set out in our Employee Code of Conduct. We expect our suppliers to take the same approach and they are required to comply with our Supplier Code of Conduct.

Amongst other things, the Supplier Code of Conduct makes it clear that we expect our suppliers to comply with the Modern Slavery Act 2015 in the countries and communities in which they and their supply chains operate. This allows us to take a consistent approach to tackling modern slavery across our supply chain.

In compliance with our Outsourcing and Material Third Party Arrangements 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 which 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 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 Procurement Policy requires each supplier to be assigned a Supplier Manager. They are responsible for ongoing oversight of the supplier in accordance with esure Group's Supplier Relationship Management Policy.

### 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 and Material Third Party Arrangements Policy** this reflects the rigorous regulatory regime that applies to business operating in the UK financial services sector 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 for employees. New starters must complete this module within four weeks of their start date.
- **Whistleblowing** This annual training is mandatory for employees. New starters must complete this module within four weeks of their start date.
- **Employee Code of Conduct** This annual training is mandatory for employees. New starters must complete this module within four weeks of their start date.

### Colleague Engagement Initiatives

We use an external company to monitor and 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 2024.

Number of cases of modern slavery incidents identified	none
Number of modern slavery incidents reported by our employees or suppliers	none
Percentage of esure Group employees who completed the Modern Slavery training allocated to them	100%
Percentage of esure Group employees who completed the Whistleblowing training allocated to them	100%
Percentage of esure Group employees who completed the Code of Conduct training allocated to them	100%
Percentage of suppliers to esure Group who have either accepted the esure Group Supplier Code of Conduct or have a similar policy	96%

### Approval

This Statement was approved by the Board of Directors of esure Group plc on 27 March 2025.



David McMillan  
**Chief Executive Officer**  
esure Group plc