

Modern Slavery & Human Trafficking Statement

Modern Slavery and Human Trafficking Statement for Financial Year ending December 2019

At Simply Business, we're passionate about building a brighter, fairer society. And when it comes to doing our part, we're serious about our commitments.

Whether it's giving back to others, ensuring inclusion and caring for the planet through our 2019-2023 [Social Impact](#) strategy or supporting Women in Finance, we believe it's our responsibility to champion equality, and create something better.

In 2017, Simply Business became an accredited [B Corp](#). This accreditation recognises our strong track record of – and commitment to – having a positive impact on people, society and the environment. That's why we're committed to complying with the Modern Slavery Act.

What is the Modern Slavery Act 2015?

The Modern Slavery Act 2015 (the "Act") seeks to address the role of businesses in preventing modern slavery occurring in their supply chains and organisations. It applies to businesses of a certain size, who are required to publish a statement setting out the steps they have taken to ensure that modern slavery and human trafficking are not taking place in their business or supply chain.

This statement sets out the steps that we have and will continue to take as part of our ongoing commitment to keep slavery and human trafficking out of our business and our supply chains.

Simply Business

Simply Business is the UK's leading online broker for SME and landlord insurance. We are a private limited company (part of the Travelers Companies, Inc group) operating in the UK and have an affiliate company, Simply Business Inc., operating in the USA. We help small businesses obtain the tailored business and landlord insurance they need, with the aim of protecting their businesses or rentals as simply as possible.

Our suppliers are businesses who support our core function as an insurance intermediary by providing a wide range of services and products (such as software and claims handling services), in addition to the insurers who provide the insurance products and underwriting capacity required to service our customers' requirements.

We believe that the nature of our business as an insurance intermediary means that we are not directly exposed to a high risk of modern slavery and human trafficking. However, the risk of modern slavery and human trafficking may not always be obvious and it is an important and ongoing risk for all businesses and organisations. We remain, therefore, committed to acting ethically and with integrity in all of our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

Our practices and policies

We want our suppliers and contractors to support our zero-tolerance approach to modern slavery, and we've taken the following steps in support of this goal:

- set up an ongoing review of our supply chains and a risk-based assessment of our suppliers;
- reviewed the Modern Slavery and Human Trafficking Statements published by our key suppliers;
- sourced our goods and services in accordance with our Ethical Procurement Policy. This sets out guidelines in respect of acceptable safety, environmental, social and local legal standards under which products and services are made and provided and is available to all Simply Business employees; and

Modern Slavery and Human Trafficking Statement

- where possible, included provisions within our contracts with suppliers that require them to comply with the law, including applicable anti-slavery and related laws including the Act.

Our employees are our biggest asset; we value them highly and have received recognition for doing so with our Sunday Times "Best UK Company to Work For" wins in 2015 and 2016. That's why it's important to us that our internal practices and policies foster an environment where our employees' wellbeing is central and they're able to identify and report any ethical issues related to modern slavery or otherwise. To support our goal, we've taken the following steps:

- made this statement publicly available on our internal intranet and our public website so that it can be accessed at any time by all employees;
- reviewed our internal policies to address modern slavery issues;
- as part of the Travelers group, we require all our employees to comply with the Travelers Code of Business Conduct and Ethics, which reflects our commitment to conduct business with honesty, integrity, and accountability;
- provided Simply Business employees with access to our Whistleblowing Policy and Equal Opportunities Policy, as well as Travelers' Code of Business Conduct and Ethics. These documents encourage employees to report concerns about any conduct they believe in good faith to be unlawful, fraudulent, or unethical and confirm that employees will be protected from any detriment arising as a result. The latter also provides employees with details of The Ethics Helpline (administered by an independent third party provider), which can be used to disclose ethical concerns; and
- implemented policies such as a reasonable adjustments and mental health policy to support the wellbeing, education and support of all staff demonstrating our commitment to a fair and open working environment where unethical working practices will not be tolerated.

We will regularly review our internal practices and our supply chain to ensure that our zero tolerance policy in respect of human trafficking and modern slavery is being upheld.

During the next financial year, we aim to identify, assess and manage risks on an ongoing basis by gathering information from suppliers during the procurement and audit processes regarding their awareness of, and compliance with, the Act, and endeavour to ensure that appropriate contractual provisions are incorporated into supplier contracts.

Our UK General Counsel, who reports to the Group CEO, is responsible for overseeing the implementation of policies and procedures relating to and for preparing the annual Modern Slavery and Human Trafficking Statement.

This statement is made pursuant to section 54(1) of the Act and constitutes our Slavery and Human Trafficking Statement for the financial year ending 31 December 2019. This statement was approved by Simply Business' Board of Directors on 24th July 2020.



David Kelly

Chairman, Xbridge Limited (trading as Simply Business)