

# Modern Slavery & Human Trafficking Statement

# Modern Slavery and Human Trafficking Statement for Financial Year ending December 2018

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. With these values central to what we're about as a business, we're committed to complying with the Modern Slavery Act.

## What is the Modern Slavery Act 2015?

The Modern Slavery Act 2015 (the "Act") addresses the role of businesses in preventing modern slavery within their supply chains and organisations. It applies to businesses of a certain size, which are required to publish a statement setting out the steps they've taken to ensure that modern slavery and human trafficking aren't taking place in their business or supply chain.

This statement sets out the steps we've taken, 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 one of the UK's leading online brokers for SME and landlord insurance. We're a private limited company (part of the Travelers Companies, Inc group) operating in the UK and the USA. We help small businesses and landlords get the tailored insurance they need, with the aim of protecting their businesses or rental properties 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), and insurers, who provide our insurance products and underwriting capacity, to meet our customers' requirements.

We believe the nature of our business as an insurance intermediary means we're 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's an important and ongoing risk for all businesses and organisations. That's why we're committed to acting ethically and with integrity in all our business relationships, and implementing and enforcing effective systems and controls to ensure slavery and human trafficking isn't 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. To make sure they do we:

- continually review our supply chains and carry out risk-based assessments of our suppliers
- review the Modern Slavery and Human Trafficking Statements published by our key suppliers
- write to our key suppliers to check their compliance with the Act and their commitment to keep their business and supply chains free from modern slavery

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- source our goods and services according to our Ethical Procurement Policy, which sets out guidelines on acceptable safety, environmental, social and local legal standards under which products and services are made and provided. This policy is available to all Simply Business employees
- where possible, include 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 people are our biggest asset and we value them highly. That's why it's important to us that our internal practices and policies foster an environment where our employees' wellbeing is central, and where they're able to identify and report any ethical issues, including those related to modern slavery. To support our goal, we:

- made this statement publicly available on our internal intranet and our public-facing website so 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, 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
- provide Simply Business employees with access to Travelers' Whistleblowing and Non-Victimisation Policy, which encourages employees to report concerns about any conduct they believe to be unlawful, fraudulent or unethical. The Ethics Helpline (administered by an independent third party provider) is available for employees to report ethical concerns, with guaranteed anonymity if they choose
- 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 won't be tolerated.

We'll regularly review our internal practices and our supply chain to ensure our zero-tolerance policy on 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. During the procurement and audit processes, we'll gather information from suppliers, about their awareness of, and compliance with, the Act, and we'll aim to ensure that appropriate contractual provisions are written 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 modern slavery and human trafficking, 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 Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2018. This statement was approved by Simply Business' Board of Directors on 28 May 2019.



**David Kelly**  
Chairman, Simply Business