

Complete Cover Group Statement on Modern Slavery 2019

This statement on slavery and human trafficking is published on behalf of Complete Cover Group (CCG) pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”). This statement applies to the financial year for CCG ending 31 December 2019.

As an organisation CCG takes its responsibilities seriously. We believe that doing the right thing builds trust, trust builds reputation and reputation builds value. We support the aims of the Act and seek to ensure slavery and human trafficking do not feature in our business or supply chain.

This is reflected through CCG’s purpose and strategy which is overseen by the Board. As part of the strategy, we review our corporate responsibility to ensure we run our business in a responsible manner, and we consider emerging social, environmental and ethical issues and opportunities.

Our Organisation’s Structure

CCG is an established insurance broker providing car, van, taxi and home insurance policies, we provide a range of products under different brands: Complete Car Cover, Complete Van Cover, Complete Home Cover, Complete Drive Cover, Complete Taxi Cover, Complete Travel Cover, Complete Car EXTRA+, Complete Van EXTRA+, Complete Car EXPRESS, Complete Van EXPRESS, FareCOVER, Hyper Hotline and Prestige Keep Moving. CCG is dedicated to ensuring all practices carried out respect the protection of basic human rights and are compliant with relevant legislation. We believe there is minimum risk of modern slavery or human trafficking as we operate a zero-tolerance approach and do not condone or facilitate modern slavery or human trafficking ourselves or through any of our partners. Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers.

CCG has in place robust recruitment policies that cover permanent, fixed term and contingent employees and require all employees to undergo background checking prior to beginning their employment with CCG. Supplier contracts also include requirements around background checking and suppliers must adhere to the applicable level of screening and our due diligence policy.

Supply Chain

CCG is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships. All insurers are authorised by and regulated by the Financial Conduct Authority or an equivalent regulatory body. This includes those insurers who operate within the European Economic Area (EEA). To the best of our knowledge, none of our supply chain is associated with modern slavery nor trafficking and we check to ensure that they have the necessary policies and procedures in place. It is our expectation that all our partners are fully compliant with both UK regulation and law including adherence to: (a) the core International Labour Organisation (“ILO”) standards which ban the use of child labour and forced compulsory or bonded labour

(including where the threat of penalty or discipline is used to compel work), whilst protecting rights to non-discrimination; and (b) the non-core ILO standards which include statements that workers should have safe and hygienic working conditions, a living wage should be paid, working hours are not excessive and abuse and intimidation are prohibited.

Procurement Processes

CCG has a centralised Procurement Policy that operates to the processes established within our Supplier and Outsourcing policy. This sets out the mandatory requirements for the Group when procuring goods and services (including our due diligence and governance processes), managing our supply base and regarding the assurance activity required across suppliers to seek to ensure policy standards are being delivered, including through desk- and field-based audits.

Our processes are designed to ensure we select and manage our suppliers appropriately based on multiple factors including value, spend and risk exposures, and our supporting processes provide a higher level of assurance, oversight and diligence for those suppliers and services segmented at higher levels. These suppliers are reviewed in line with the requirements of our Modern Slavery Statement.

Due diligence is undertaken on new suppliers sourced through the Procurement & Supply Chain function – we require suppliers either to provide a link to their most recent Modern Slavery statement or to answer a number of questions (should they fall below the reporting threshold) to articulate the steps they are undertaking to support compliance with the Act.

Onboarded suppliers are then subject to assurance activity. Operations with the assistance of Compliance are required to conduct regular field reviews on our actively managed suppliers and the scope includes the requirement to ascertain the supplier's adherence to the Act and confirmation of the activity they are undertaking to comply with the Act. This is tailored dependant on the supplier's alignment to the reporting threshold. In addition, background checking contractual clauses also form part of the assurance scope alongside compliance to the overall contractual terms.

Findings from assurance activity are documented, managed and reported through our governance and escalated as appropriate to the Board.

Supporting processes are reviewed on an annual basis to ensure alignment with legislation and raise awareness of Modern Slavery to encourage any employees who do identify potential Modern Slavery issues within our business or supply chain to report their concerns either through normal channels of escalation or via our whistle-blowing line.

Policies

CCG has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These include:

- Limiting the use of third parties - which sets out internal requirements for buying goods and services from third parties;
- Procurement Policy - covering issues of human rights, child and forced labour and modern slavery, which CCG's suppliers are required to comply with; and
- Outsourcing Policy – this sets out the use of a third party service provider in any number of operational functions to perform ongoing activities (including agreements for a limited period), that would normally be undertaken by CCG personnel. This policy is designed to manage the risks associated with outsourcing agreements.
- Whistleblowing Policy - which encourages staff to report concerns including any related to modern slavery/trafficking and child or forced labour. We have a whistleblowing email address to enable/allow anyone who has concerns to raise them confidentially to a specific person in our organisation
- Recruitment Policy - When recruiting we have a recruitment processes in line with UK employment laws, including: 'right to work' document checks; credit and DBS checks as per our contracts of employment and checks to ensure everyone employed is 17 or above. We review salary and rewards annually

Next steps

As CCG is committed to continuing to enhance the processes we have already established within our Procurement & Supply Chain function we will be looking to focus on key areas of improvement in 2020. These will include:

- incorporating Modern Slavery awareness training in our onboarding induction for all employees and ensuring clear guidance is available for our low-risk sourcing process.
- identifying potential key risk indicators that could be implemented to assess the effectiveness of our processes; and
- reviewing and evaluating the measures and processes that we have implemented thus far and considering additional measures we can take as a business. Through working with our suppliers, we aim to prevent modern slavery occurring in our business and supply chain.

Board / CEO

This statement has been formally approved by the board who is dedicated in supporting the eradication of modern slavery and human trafficking.

Angela Darling

Group Compliance Director

31 January 2020