



# Modern Slavery Policy And Human Trafficking Statement

**Debbie Mawer, Director of HR & People Services**

**This policy is up to date and will be updated and reviewed in line with current legislation and/or company updates**

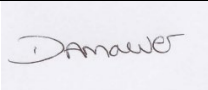
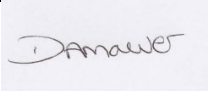
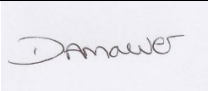
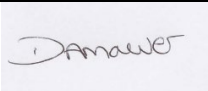
## Revision History

Version	Date	Revision Author	Summary of Changes
2.0	2020	Debbie Mawer	Full Policy – approved
2.1	2021	Debbie Mawer	Review of full policy – no changes
2.2	2022	Debbie Mawer	Review of full policy – no changes
2.3	2023	Debbie Mawer	Review of full policy – co changes
2.4	2024	Debbie Mawer	Review of full policy – no changes
2.5	2026	Debbie Mawer	Review of full policy

## Distribution

Name	Title
Debbie Mawer	Director of People & Culture

## Approval

Name	Position	Signature	Date
Debbie Mawer	Director of People & Culture		November 2020
Debbie Mawer	Director of People & Culture		December 2021
Debbie Mawer	Director of People & Culture		December 2023
Debbie Mawer	Director of People & Culture		December 2024
Debbie Mawer	Director of HR & People Services		

## Review

Review Frequency	Next Review Date	Review owner	Signed off Date
Annually	November 2021	Debbie Mawer	November 2020

Annually	December 2022	Debbie Mawer	December 2021
Annually	December 2023	Debbie Mawer	December 2022
Annually	December 2024	Debbie Mawer	December 2023
Annually	December 2025	Debbie Mawer	
Annually	May 2027	Debbie Mawer	May 2026

## **Modern Slavery Policy and Human Trafficking Statement**

The Company trading as Claims Consortium Group ('the Company') and its subsidiaries (together 'the Group') is a business providing services to Insurance Companies, Insurance Brokers and Policy Holders throughout the UK

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## Section 1

### Statement of Intent

#### Candidate Privacy Notice

The Company trading as Claims Consortium Group (“the Company”) and its subsidiaries (together ‘the Group’) is a business providing services to Insurance Companies, Insurance Brokers and Policy Holders throughout the UK.

At Property Consortium UK Ltd t/a Claims Consortium Group (“the Group”), we are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about you, how we use it, and the conditions under which we may disclose it to others and how we keep it secure. If you are a member of Claims Consortium Group Staff, you should refer to the Claims Consortium Group Staff Privacy Policy which is available on intranet.

This policy applies to all candidates directly introducing themselves to Claims Consortium Group as well as those represented by third party agencies that we work alongside.

**Signed:**

A handwritten signature in black ink, appearing to read 'Jeremy Hyams', with a large, sweeping flourish underneath.

**Jeremy Hyams, CEO**

## Section 2

### 1. Introduction

This policy is made in accordance with the requirements of the UK Modern Slavery Act 2015, including Section 54 on transparency in supply chains. It sets out the commitment of Property Consortium UK Ltd trading as Claims Consortium Group (“the Group”) to preventing modern slavery and human trafficking within its operations and supply chains.

Modern slavery is a criminal offence and a serious violation of fundamental human rights. It encompasses slavery, servitude, forced or compulsory labour, and human trafficking. The Group recognises its responsibility to take a robust and proactive approach to ensuring that such practices do not occur in any part of its business or associated supply chains.

### 2. Scope

This policy applies to all individuals working for or on behalf of the Group in any capacity. This includes employees at all levels, directors, officers, agency workers, contractors, consultants, and any third-party representatives or business partners. The principles set out in this policy extend to all business relationships and supply chain activities undertaken by the Group.

### 3. Policy Statement

The Group operates a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all business dealings. The organisation is dedicated to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere within its business or supply chains.

The Group is also committed to ensuring openness and accountability in its approach to tackling modern slavery and expects the same high standards from all suppliers, contractors, and business partners. Any form of exploitation, forced labour, or human trafficking is wholly unacceptable and will not be tolerated under any circumstances.

### 4. Organisational Structure and Supply Chains

The Group provides services to insurance companies, insurance brokers, and policyholders throughout the United Kingdom. Its supply chains include a range of service providers, including professional services, technology providers, property repair contractors, and recruitment agencies.

The Group acknowledges that certain areas of its supply chain may present a higher risk of exposure to modern slavery, particularly where labour is outsourced, temporary, or provided through third-party agencies. As such, the organisation is committed to identifying and managing these risks appropriately.

### 5. Risk Assessment and Due Diligence

The Group adopts a risk-based approach to assessing and managing exposure to modern slavery. This includes evaluating the nature of suppliers, the services they provide, and the environments in which they operate. Particular attention is given to sectors and roles where there is an increased risk of exploitation.

As part of its due diligence processes, the Group undertakes appropriate checks on new suppliers and business partners prior to engagement. Contractual arrangements include provisions requiring compliance with applicable laws relating to modern slavery and human trafficking. The Group also reserves the right to review and, where necessary, audit supplier practices to ensure ongoing compliance.

## **6. Supplier Expectations**

The Group expects all suppliers and business partners to conduct their operations in a manner that respects human rights and prevents modern slavery. Suppliers must ensure that all work is carried out voluntarily, that workers are free to leave their employment, and that they are not subject to coercion, exploitation, or inhumane treatment.

Suppliers are required to provide safe working conditions, comply with applicable employment laws, and ensure that wages and working hours meet legal standards. The Group expects its suppliers to apply these same standards within their own supply chains.

## **7. Training and Awareness**

The Group recognises the importance of education and awareness in preventing modern slavery. Appropriate training is provided to employees, particularly those involved in recruitment, procurement, and supply chain management, to ensure they understand the risks and are able to identify potential indicators of modern slavery.

The organisation also ensures that its policies and expectations are communicated clearly to all relevant stakeholders.

## **8. Reporting Concerns**

The prevention, detection, and reporting of modern slavery is the responsibility of all individuals working for or on behalf of the Group. Any concerns or suspicions regarding modern slavery must be reported as soon as possible.

Employees are encouraged to raise concerns through their line manager or via the Group's whistleblowing procedures. The Group is committed to ensuring that individuals who report concerns in good faith are supported and protected from retaliation or detrimental treatment.

## **9. Monitoring and Effectiveness**

The Group is committed to continuously improving its approach to combating modern slavery. The effectiveness of this policy is monitored through internal review processes, including oversight of supplier compliance, training completion, and any reported concerns.

The policy is reviewed annually to ensure it remains effective, relevant, and aligned with legal and regulatory requirements.

## **10. Responsibility for the Policy**

The Board of Directors has overall responsibility for ensuring that the Group complies with its legal and ethical obligations in relation to modern slavery. Day-to-day responsibility for implementing this policy lies with senior management, including the Director of HR & People Services.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are provided with appropriate guidance and training.

## **11. Breaches of the Policy**

Any breach of this policy by employees may result in disciplinary action, up to and including dismissal. The Group reserves the right to terminate relationships with suppliers, contractors, or other business partners who fail to comply with this policy or who are found to be involved in modern slavery practices.

## **12. Approval and Review**

This policy is approved by the Board of Directors and will be reviewed on an annual basis to ensure its continued effectiveness and compliance with legal requirements.