

CLAIMS CONSORTIUM GROUP

Modern Slavery Act & Human Trafficking Statement

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Approval

Name	Role	Date
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Contents

1	Introduction.....	3
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1.1	Scope	4
1.2	Related Documents	4
1.3	Purpose	4
2	Policy	5

1 Introduction

1.1 Scope

The Company trading as Claims Consortium Group (“the Company”) and its subsidiaries (together “the Group”) is committed to preventing modern slavery and human trafficking in all aspects of its business and supply chains. We recognise our responsibility to uphold and promote ethical standards, protect human rights, and act with integrity in all our operations. The Group has a zero-tolerance approach to any form of modern slavery and is dedicated to implementing and maintaining effective systems, controls, and due diligence processes to identify, prevent, and address any potential risks. We expect the same high standards from all employees, suppliers, contractors, and business partners, and are committed to fostering a culture of transparency, accountability, and respect.

1.2 Related Documents

This policy should be read in conjunction with the following documents:

- Disciplinary
- Equality and Diversity
- Grievance
- Social Media

1.3 Purpose

The purpose of this policy is to set out the Group’s approach to preventing, identifying, and addressing modern slavery and human trafficking within its operations and supply chains. It provides a framework for ensuring compliance with the Modern Slavery Act 2015 and outlines the responsibilities of employees, managers, and business partners in upholding ethical standards. This policy aims to promote a culture of vigilance, transparency, and accountability, ensuring that all individuals working for or on behalf of the Group understand the risks of modern slavery and are equipped to respond appropriately.

2 Policy

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.