

# Modern Slavery Statement 2023

**animal  
Friends**  
Pet Insurance

## INTRODUCTION

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and will be reviewed for each financial year.

In line with AFI's values and principles we are committed to contributing to the eradication of modern slavery and human trafficking.

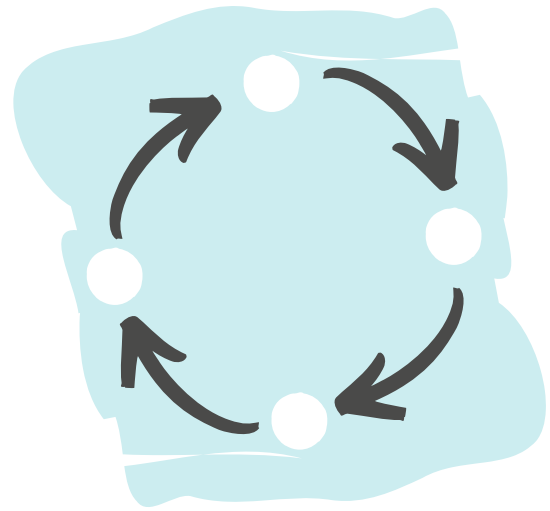
We have various measures in place to reduce the risk of modern slavery and human trafficking occurring anywhere in our organisation or supply chain.

We outline below the efforts and activities we have undertaken during the financial year ending 31 December 2023 to improve in our abilities to identify and prevent modern slavery and human trafficking.



## ORGANISATION STRUCTURE, BUSINESS AND SUPPLY CHAINS

Animal Friends is an insurance intermediary firm distributing pet insurance. Our supply chain involves the provision of goods and services to support our business in delivering insurance and claims services to policyholders. Almost all of our business is conducted in the UK, with a small portion being performed outside the UK via an outsourced partner. As a provider of insurance, AFI has evaluated the risk of modern slavery to be low. It should be noted that during 2023, AFI became part of the Pinnacle Pet Group Limited (PPG). During 2024, AFI will review its Policies to consider alignment with PPG.



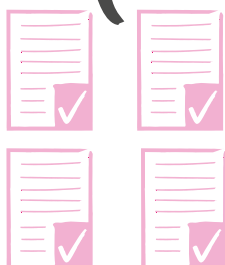
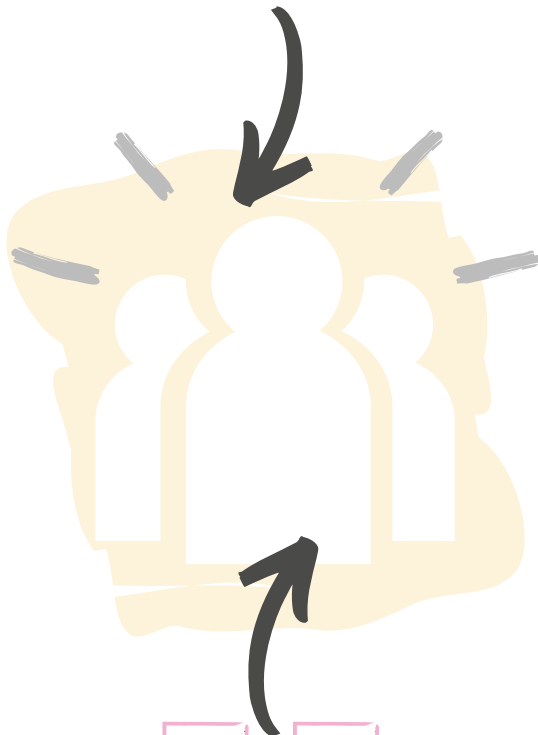
## POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

At Animal Friends, we have clear and accessible Policies promoting human rights to ensure all colleagues are aware and comply with our zero-tolerance approach to modern slavery. Policies include:

- 🐾 Modern Slavery Policy
- 🐾 Equality & Diversity Policy
- 🐾 Whistleblowing Policy
- 🐾 Outsourcing Policy
- 🐾 Recruitment Policy
- 🐾 Reward Policy (externally benchmarked)
- 🐾 Overtime Policy (includes working time directive compliance)
- 🐾 Disciplinary Policy
- 🐾 Fit and Proper Policy (includes check of eligibility to work in the UK)

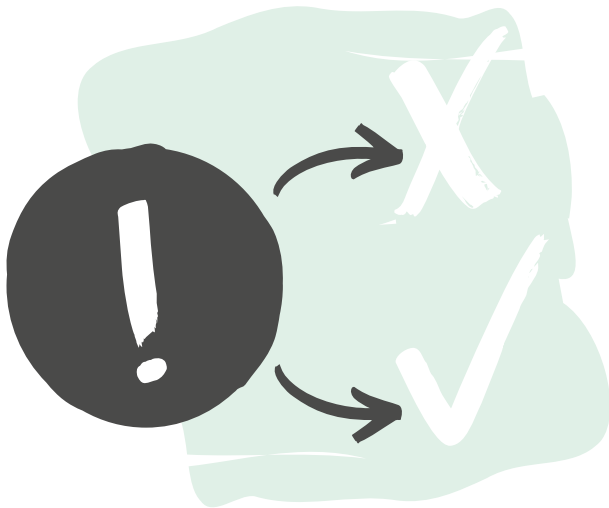
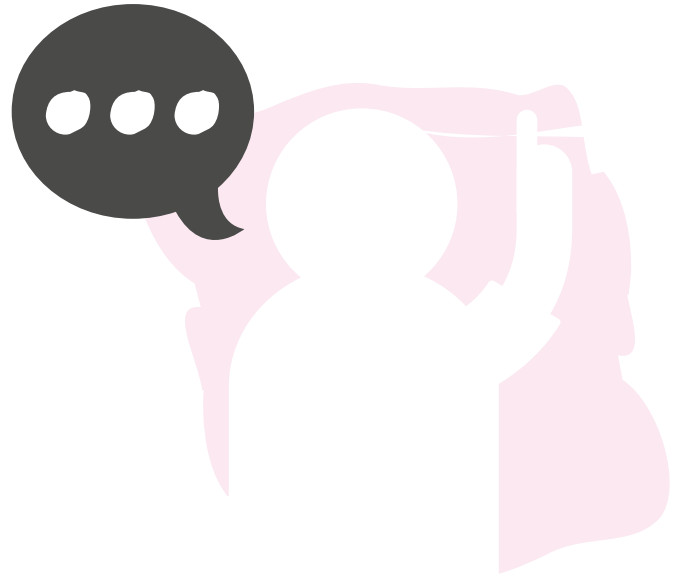
During 2023 we continued to review our Policies, improving clarity to make the messages even easier for our colleagues to understand.

We have continued to work with the screening provider we appointed in 2022. This provides us with enhanced checking prior to candidates joining us, including digital right to work checks, removing risk and ensuring compliance.



## OUR REPORTING MECHANISMS AND COMMUNICATIONS

During 2023 we continued to improve our communications to colleagues. An easily accessible on-line Colleague Handbook highlights the various methods we have in place to raise concerns regarding unethical conduct, including modern slavery related concerns and any potential human right violations. We encourage a healthy “speak up” culture through strong governance and clear Policies that support our colleagues, customers and suppliers to be treated with dignity, fairness and respect.



## OUR APPROACH TO RISK MANAGEMENT AND DUE DILIGENCE

The overall risk of modern slavery at AFI remains low with the majority of our colleagues continuing to work in low-risk office and home-based roles, for example Customer Services and IT. Any risks that may exist are likely to be through our use of third-party suppliers, to mitigate this risk we complete detailed due diligence and background checks on new and existing suppliers to identify key concerns including any known involvement in modern slavery, people trafficking or other human rights abuse.





## PEOPLE, TRAINING AND AWARENESS

At AFI we continue to provide a variety of methods of training, learning and resources to reinforce and ensure key changes to modern slavery practices are communicated effectively. Annual refresher training is delivered to all colleagues as part of our Mandatory training schedule to ensure that we achieve compliance with regulatory standards.

For colleagues who join us and are new to AFI, awareness of our Policies is ensured through our respective onboarding programs, with the training materials designed to address the needs of our colleagues according to the area of the business in which they operate.

In 2022/23 as part of our Strategic pillars we redeveloped our Diversity, Equity, Inclusion and belonging Policies, processes, and associated training. This work will continue and broaden throughout 2024 and whilst not directly linked, will provide our colleagues with further guidance on our expectations and their responsibilities towards inclusion, wellbeing and protected characteristics that demonstrates we are an inclusive workplace.

We recognise the need to continually review and develop additional tools and training materials as needed particularly in areas that may be deemed high risk, therefore, we will continue to monitor and learn from industry best practices as they develop and consult with external stakeholders as appropriate to help strengthen our efforts.

We have robust Policies for recruitment, including conducting “eligibility to work in the UK” checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We have a Reward Policy which outlines our approach to remuneration and benefits where we commit to rewarding and paying everyone fairly. All roles are allocated a salary band using external market data from Willis Towers Watson, taking into account the following: seniority of the role, management responsibilities and function of the role.

All employees are issued with an employment contract informing them of both their contractual and statutory rights, such as holiday pay, sickness pay and any other benefits to which they may be entitled.



All employees are required to attest to the fact that they have read and understood the related Policies and will uphold the standards required of them. We review and assess our corporate risk and regulatory training requirements annually.

All colleagues within our business are encouraged to report any concerns regarding slavery and/or human trafficking in accordance with our Whistleblowing Policy.

All Managers have access to leadership essentials training which helps them develop the knowledge to administer the lifecycle of an employee effectively. This ensures all colleagues are treated fairly and supported during their employment at AFI. Managers also develop skills to build positive working environments, promoting a culture of respect and ethical behaviour.

Our annual engagement survey practice plays a crucial role in supporting our modern slavery mitigation efforts by providing a valuable mechanism for gauging employee satisfaction, well-being, and perceptions within the organisation. By regularly assessing the workforce's sentiments, we gain insights into potential issues related to workplace conditions, ethical practices, and overall job satisfaction. This proactive approach allows us to identify and address any concerns or vulnerabilities related to modern slavery promptly. Additionally, the survey serves as a tool for promoting transparency and open communication, encouraging employees to report any observations or suspicions related to exploitative practices. By fostering a culture of employee engagement, the survey practice contributes to creating a vigilant and informed workforce, aligning with our commitment to ethical practices and reinforcing our stance against modern slavery.



## PROCUREMENT AND OUTSOURCING

At AFI we consider the risk of modern slavery as part of our ongoing approach to identifying and assessing current and emerging risks. As noted previously, we have assessed the risk of modern slavery to be low at AFI due to the nature of the service and activities we carry out.

Any risks we do face, are most likely to occur through our use of third-party suppliers. Procurement have strengthened the risk assessment and due diligence processes for suppliers at AFI. We have implemented measures to ensure we reduce and prevent the risks associated with using third-party suppliers, running detailed due diligence and background checks on any new and existing suppliers to help us identify any risks relating to modern slavery, corruption, bribery, sanctions, and other forms of noncompliance.

We continue to monitor supplier risks through our Supplier risk register to assess where the risks and opportunities are within our business and supply chains. This is reviewed and updated on a regular basis to ensure that any new concerns are identified and addressed as soon as possible, with input from various stakeholders from across the business including Risk, Data Protection and Compliance.

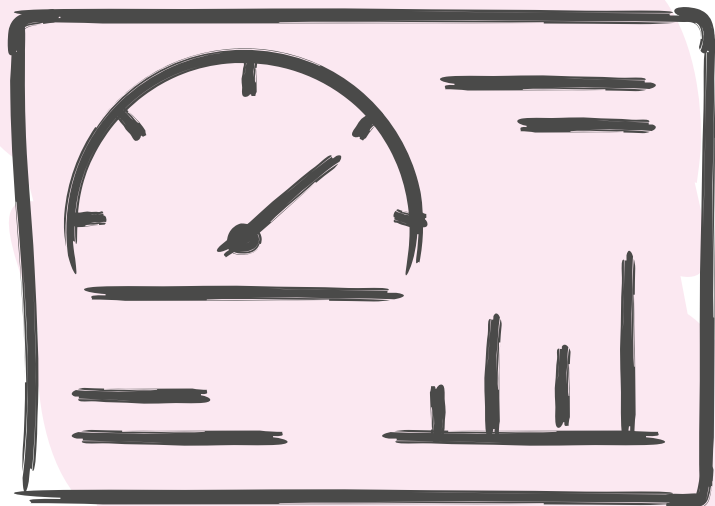
## OUR KEY PERFORMANCE INDICATORS

At AFI, we understand that it is difficult to measure some of the outcomes and gauge the impacts in relation to our approach to human rights and endeavours to tackle modern slavery, as these are complex matters.

We rely on KPIs to summarise performance against identification and mitigation activities, as follows:

- 🌸 Number of cases of modern slavery discovered at AFI or in our supply chain – 0
- 🌸 Number of modern slavery threat assessments conducted on high-risk suppliers – 0
- 🌸 Number of AFI's third parties/supply chains/partnerships that have received modern slavery training – 5
- 🌸 Number of speak up cases connected to modern slavery or related issues – 0

We continually create, assess, and amend Policies, procedures and controls that directly link to our supply chains and outsourcing arrangements.





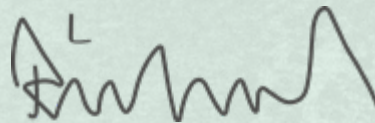
# Plans 2024/2025

- 🐾 Continue to strengthen our understanding and approach to identifying, mitigating, and managing modern slavery risk via our due diligence process across AFI and our supply chains.
- 🐾 Continually test and improve our internal risk and control framework.
- 🐾 Audit our own progress to improve in our abilities to identify and prevent modern slavery and human trafficking.
- 🐾 Continue exploring how we can use our influence to mitigate and manage human rights infringements using our relationships with our supply chains and our controls within AFI.
- 🐾 Continue to develop our approach to Diversity, Equity, Inclusion and Belonging and provide our colleagues with further education and awareness on how to treat protected characteristics and how they can contribute to AFI being an inclusive workplace.
- 🐾 Provide up to date relevant modern slavery training and distribute to all colleagues to increase understanding and awareness.

- 🐾 Review our anti-modern slavery and human rights related KPIs.
- 🐾 Review and update our modern slavery related Policies to ensure effectiveness.

We will publish an update on our website next year.

The Animal Friends Board have reviewed and approved this statement. The Animal Friends Chief Executive Officer has signed this on behalf of the Board.



**Richard Mills,**  
Chief Executive Officer

January 2024