

Modern Slavery Statement 2020

**animal
Friends**
Pet Insurance Experts

Introduction

This statement is made pursuant to Part 6 Section 54 of the Modern Slavery Act 2015 (MSA). It sets out Animal Friends Insurance's commitment to preventing slavery and human trafficking and outlines our efforts and activities to mitigate the risk of slavery and human trafficking during the financial year ending 31 December 2020.

Organisation structure, business and supply chains

Animal Friends is an insurance intermediary firm distributing pet insurance. Our supply chain consists of the provision of services and goods to support the delivery of insurance and claims services to our policyholders. The majority of our business is conducted in the UK, with a portion conducted in India.

Measures in Place

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

Policies in relation to slavery and human trafficking

At AFI, we acknowledge that clear policies and governance are fundamental in promoting human rights and directly support the management of any related infringements. With this in mind, we ensure all colleagues can access all our policies and principles through designated communication channels.

Policies which support our zero-tolerance approach to modern slavery 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

Our reporting mechanisms

We clearly communicate to our colleagues the methods we have in place to raise concerns regarding unethical conduct, which includes modern slavery related risks and concerns. We ensure our colleagues received training on our whistleblowing policy which informed them on how to raise concerns. Following this, we established a dedicated mailbox to this cause.

Our approach to risk management and due diligence

At AFI we consider the risk of modern slavery as part of our ongoing approach to identifying and assessing current and emerging risks. We have assessed the risk of Modern Slavery to be low at AFI due to the type of service and activities we carry out, with the majority of our colleagues working in low-risk office roles e.g., customer services, HR, finance and IT.

Any risks we do face, are most likely to occur through our use of third-party suppliers, this risk is mitigated through the completion of detailed due diligence and ongoing risk assessments of all key suppliers. This includes completion of detailed background checks overseen by our Procurement team with support from key individuals from across the business (Risk, HR, IT) to ensure we consider all potential issues and take appropriate action where required.

People, training and awareness

We have robust policies for recruitment, including conducting "eligibility to work in the UK" checks for all colleagues to safeguard against human trafficking or individuals being forced to work against their will.

All colleagues 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.

We provide a variety of methods of training, learning and resources to reinforce and ensure key changes to working

practices are communicated effectively and run annual refresher training to ensure compliance against expected regulatory standards.

Our colleagues have a performance management framework in place that is reviewed at regular intervals to ensure skills, knowledge and ability is maintained.

Awareness of our policies is ensured through our Onboarding programme for new joiners and a programme of online awareness training, to refresh knowledge and understanding and to highlight any changes. During 2020, we delivered a variety of training to colleagues across all departments to ensure a continued understanding and awareness of regulatory and legislative requirements.

We review, update and assess our corporate risk and regulatory training requirements annually.

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. We have assessed the risk of Modern Slavery to be low at AFI due to the type of service and activities we carry out, with the majority of our colleagues working in low-risk office roles e.g., customer services, HR, finance, and IT. Following best practice, we include modern slavery in all our contracts.

Any risks we do face, are most likely to occur through our use of third-party suppliers, this risk is mitigated through the completion of detailed due diligence and ongoing risk assessments of all key suppliers. This includes completion of detailed background checks overseen by our Procurement team with support from key individuals from across the business (Risk, HR, IT) to ensure we consider all potential issues and take appropriate action where required.

Our key performance indicators

AFI understands that it is not easy to measure some of the outcomes and gauge the impacts in relation to our approach to human rights and endeavors to tackle modern slavery, as these are complex matters. The KPIs that follow help summarise some of the efforts and progress we made this year:

- 🐾 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 AFIs third parties/supply chains/partnerships that have received modern slavery training in 2020 – 5
- 🐾 Number of speak up cases connected to modern slavery or related issues – 0

We have created, assessed, and amended policies, procedures and controls that directly link to our supply chains and outsourcing arrangements.

Future Plans and key priorities for 2020/2021

- 🐾 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.
- 🐾 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.
- 🐾 Create up to date relevant modern slavery training and distribute to all colleagues to increase understanding and awareness.
- 🐾 Continually reviewing our supply chains to ensure they have the appropriate frameworks, training, and controls in place to prevent and manage modern slavery.
- 🐾 Enhance our anti-modern slavery and human rights related KPIs.

Ethical Statement

Reducing our impact on the environment around us.

The climate crisis is a threat to life on this planet as we know it. Greenhouse gas emissions across the world have been steadily rising and we can now actively see the impact this is having on the planet. Rising temperatures are leading to an increase in natural disasters and extreme weather conditions and we are seeing vast environmental degradation to the natural environment around us. This rise in natural disasters and extreme weather conditions can have a negative impact on the socio-economic vulnerabilities in some countries – leading to marginalisation and an increased risk of modern slavery.

At Animal Friends we are committed to reducing the impact our business is having on the environment and in turn, modern slavery. Across 2021 a carbon footprint project will be measure Animal Friends greenhouse gas emissions across its business and develop ambitious plans for a sustainable, low carbon future.

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



Westley Pearson,
Chief Executive Officer

25th June 2021