

# Modern Slavery Statement



## **Modern Slavery Statement**

### **FROM THE BOARD OF DIRECTORS ON BEHALF OF THE MARKERSTUDY GROUP OF COMPANIES**

We are proud of the steps we have taken to combat slavery and human trafficking. As a Board we are committed to ensuring that slavery and human trafficking will not be tolerated within our Group of Companies or within our supply chain. The Companies covered by this statement are listed on the attached schedule.

### **ORGANISATION STRUCTURE**

Markerstudy Group is an energetic and highly innovative organisation, primarily known for our association with the insurance brands, Markerstudy Insurance, Zenith Insurance and Zenith Marque as well as direct brands Geoffrey Insurance Services, Supercover Insurance and The Insurance Factory. A rapidly expanding privately-owned business, our UK operation is headquartered in Bessels Green, Kent. Established in 2001 and employing around 4,000 staff in locations throughout the UK, we're proud to be listed in 'The Sunday Times Best 100 Companies to Work For', and are committed to our ethos of 'putting the fun into insurance' for the good of our customers, employees and the community. More information on our business can be found here <https://www.markerstudygroup.com>

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Markerstudy Group and its employees have a clear vision, with a set of 'V10' values which help us reach our objectives as a group. These represent a 'promise' that we will promote fairness and integrity in all our dealings, both internally and externally.

Markerstudy Group recognises that Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This policy applies to all Markerstudy Group Companies whether they are regulated by the FCA or not.

Whilst the board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it, our Senior Management Team works in conjunction with our support functions to ensure that our Anti-Slavery Policy is complied with and to manage any concerns or breaches. We also have a Whistleblowing Procedure which is available on the Company's intranet site.

### **SUPPLIER DUE DILIGENCE**

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and all our suppliers are expected to comply with all applicable laws.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We request information from our suppliers, which may include, but is not limited to, health and safety, environmental responsibility, equality, anti-corruption and insurance protection.

### **IMPROVEMENTS AND MONITORING**

We continue to review our supply chain protocols and to introduce specific measures to ensure that our obligations under the Act are passed through our supply chain.

These include efforts to:

- Obtain contractual warranties in new engagements, which ensure that no slavery is used anywhere in the supplier's business, by any of the suppliers in its own supply chain, and that all necessary policies and processes have been implemented to ensure that this continues to be the case;
- Obtain a contractual right to request compliance-related information and the right to second party audit of suppliers at our discretion;
- Add indemnity provisions and rights to terminate engagements in the event of breach of our Anti-Slavery Policy;
- Ensure risk areas are documented, monitored and taken into consideration in any future contract renewals.
- Train employees on the impact of the Act

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2018.

A handwritten signature in black ink, appearing to read 'Kevin Spencer'.

Kevin Spencer

**Chief Executive Officer**

31<sup>st</sup> March 2019

### List of Companies included within this Statement

Markerstudy Insurance Services Limited  
Zenith Freeholds (Whitstable) Ltd  
Old ML Limited  
Zenith Insurance Management UK Limited  
Go Get It Ltd  
Supercover Insurance Ltd  
INTAA Limited  
Insurance Factory Ltd  
Delta Underwriting Agency Ltd  
Drivology Limited  
Lancaster Insurance Services Ltd  
Ultimate HC Ltd  
Ultimate Insurance Solutions Ltd  
Ultimate Pet Partners Ltd  
BPI Holdings Ltd  
BDML Connect Ltd  
The Policy Shop Insurance Services Ltd  
Markerstudy Direct Ltd  
Markerstudy Holdings (UK) Limited  
Markerstudy Holdings (UK) No.2 Limited  
Markerstudy Limited  
MSG Automotive Solutions Ltd  
Trifords Ltd  
Vision Vehicle Solutions Ltd  
AutoWindshields (UK) Ltd  
Synchronicity Insurance Solutions Ltd  
Telemga Ltd  
ASA Broking Ltd  
Caterers Club Ltd  
Drivology Holdings Limited  
Lionheart Insurance Services Ltd  
Symphony Company Ltd  
Thames City Insurance Consultants Ltd  
Wessex Insurance Funding Ltd  
We Trade It Ltd  
MS SPV Ltd