

# ANTI-SLAVERY & HUMAN TRAFFICKING ANNUAL STATEMENT

## 1: Opening statement from senior management

The SimplyBiz Group plc is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. We ensure that all staff have the right to work within the UK and are treated with respect, remunerated with a Living Wage and comply with all employment legislation. This is an ongoing commitment and is regularly reviewed in line with legislative changes.

We are also 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 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.

## 2: Structure of the organisation

The SimplyBiz Group plc is UK based firm and provides intermediary services and distribution solutions to the retail financial services sector. The SimplyBiz Group plc wholly owns Simply Biz Limited which employs 420 people and its business operations are solely operated in the United Kingdom.

The Group's annual turnover in FY18 was £50.7m. To find out more about the nature of our business, please visit [www.simplybizgroup.co.uk](http://www.simplybizgroup.co.uk).

Our business is organised into 2 separate business units, Intermediary Services and Distribution Channels. The Intermediary Services division focuses on supporting a membership base of IFA's and other regulated firms, primarily through providing compliance support. Services include access to a mortgage club, investment solutions, client planning software and areas such as provision of supplementary services including legal support, workplace solutions and surveying. Distribution Channels predominately provides marketing and promotional services to large institutions, along with investment management services and technology integration to enable IFA's to transact investments on behalf of their client base.

## 3: Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

- We expect the same high standards from all of our contractors, suppliers and other business partners, and 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
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control
- Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage
- We encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern

- Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary
- Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter
- We may terminate our relationship with other individuals and organisations working on our behalf if we feel they do not make appropriate provision to ensure compliance with the Modern Slavery Act

#### **4: Due diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures. Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistle-blowers

#### **5: Risk and compliance**

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain.

In light of where we do business, where our suppliers are based and the industry in which we operate, we consider that there is a very low risk that modern slavery and human trafficking may affect our business.

We ensure all our suppliers adhere to our anti-slavery policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies we will immediately seek to terminate our relationship with the relevant supplier.

#### **6: Effectiveness and KPIs**

During 2019, the SimplyBiz Group will introduce key performance indicators (KPIs) to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. These will include measures on:

- Percentage of staff who have completed formal e-learning (13 month rolling)
- Percentage of high risk supplier contracts without model Modern Slavery Clauses included
- Conducting annual reviews of high-risk suppliers (where identified as such)

#### **7: Training**

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

#### **8: Further actions and sign-off**

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Introduction of the KPI monitoring outlined in paragraph 6 of this statement.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes The SimplyBiz Group's slavery and human trafficking statement for the financial year commencing 1 January 2018 and ending 31 December 2018.

This statement was approved by the Board on 28 March 2019.

A handwritten signature in black ink that reads 'Neil Stevens'.

Neil Stevens, Joint CEO, The SimplyBiz Group plc

Date: 28 March 2019