

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 by Southern Rock Insurance Company Limited (SRICL) for the current financial year. Future statements will be updated and published annually in line with our accounts.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business, including in our supply chains. We are resolved to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

We have a Code of Ethics that everyone at SRICL is required to display and we expect our partners and suppliers to adopt. These values include being fair to everyone who works for us and with us.

1. ORGANISATIONAL STRUCTURE

SRICL is a subsidiary of Southern Rock Holdings Limited. Its ultimate parent company is Rock Holdings Limited, a company registered in the Isle of Man. Rock Holdings Limited is a holding company which does not trade and therefore is not regulated.

SRICL and its subsidiaries have fewer than 50 direct employees in Gibraltar.

Southern Rock Insurance Company Limited is a regulated insurance Company based in Gibraltar which underwrites motor insurance policies in the UK.

2. KEY PARTNERS AND SUPPLY CHAIN

SRICL works with several key partners and suppliers:

Eldon Insurance Services Limited is an insurance broker and claims manager, authorised and regulated in the UK by the Financial Conduct Authority:

- As an independent insurance broker, insurance policies are sold under the brand names, **Go Skippy, Vavista and Debenhams**.
- As an insurance claims manager, claims are managed proactively, both for policyholder and insurer, settling claims efficiently and cost effectively.

Business Choice Direct Insurance (BCD) is a subsidiary of Eldon Insurance Services Limited which specialises in insurance products for the transport and construction industry and is based in Southampton. Through BCD we offer a wide range of insurance products to Retail, Office, Licenced Trade, Professional Indemnity, Residential and Commercial Landlords. BCD caters for the needs of couriers, hauliers or fleet operator driving cars, vans as well as HGV's. **Footprint Insurance** is a trading arm of BCD providing van and bike insurance.

Debenhams are a leading international, multi-channel brand with a proud British heritage, which trades out of over 240 stores across 27 countries. SRICL provides customers with insurance policies using the Debenhams brand via Eldon Insurance Services Limited. Debenhams publish their own Modern Slavery Statement which can be found at <http://sustainability.debenhamsplc.com/wp-content/uploads/Final-ch-11-07-10-16.-Debenhams-Modern-Slavery-Satement-2016-Copy-2.pdf>.

Outworx handles the policy administration for many of Eldon Insurance Services Limited brands in South Africa. These include Go Skippy, Vavista and Debenhams. Outworx ensure that they have

knowledgeable, customer-focussed staff in place to support the administration of our customer's policies. Outworx has over 400 employees in South Africa. Their values include employee transparency, accountability, respect, trust and collaboration.

As well these key partners, SRICL works with other entities who provide financial, actuarial, administration and data protection, fraud prevention and identity verification, and claims handling services. SRICL is committed to ensuring that there is no modern slavery or human trafficking in any part of our business, including those to whom we provide services and those whom provide services to us.

3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have implemented internal policies to ensure compliance with legislation and best practice, including the following:

- Anti-money Laundering and Counter-terrorist Funding (AML) Policy
- Code of Ethics
- Equal Opportunities policy
- Outsourcing Policy

- Abusive and Unacceptable Behaviour Policy
- Anti-harassment and Bullying Policy
- Values and Behaviours
- Health & Safety Policy
- Whistleblowing Policy
- Recruitment checks - Employment References and checks

These policies encourage ethical behaviour and respect for human rights throughout our organisation and supply chain.

Policy compliance is monitored by our Risk and Compliance team with oversight by the senior management team and the Board.

4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We conduct ongoing due diligence on our claims handlers, brokers and intermediaries, including, which is reviewed by our Risk, Compliance, and Investment Committee.

We work closely with Eldon Insurance Services who maintain oversight of Outworx, with directly employed staff working in their offices in South Africa, and senior management regularly attending their offices to audit compliance with policies and processes.

We have in place systems for staff to report any concerns and to protect whistle blowers.

As part of our ongoing compliance and risk monitoring exercises, both internally within the group and in relation to monitoring third parties, we are developing key indicators to identify and assess areas of potential risk in our supply chains. We can take steps to mitigate any risk of slavery and human trafficking occurring in our supply chains and monitor on an ongoing basis.

5. SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking and we expect the same approach from all of our partners and suppliers. We encourage our partners and suppliers to take the same ethical

approach to business as we do. We include provisions in our key contracts that our partners and suppliers should adhere to our policies.

6. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we now provide with training so they understand the key provisions of the Modern Slavery Act, how to recognise slavery practices and report them to the police or local enforcement bodies.

7. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

As a regulated business, we maintain a high standard of risk management, auditing and compliance monitoring in order to protect our customers. We apply the same standards to ensuring that we conduct business ethically, including combating slavery and human trafficking.

As part of our ongoing process for improving our standards and controls, we are reviewing the key performance indicators (KPIs) that we can use to measure how effective we are in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

We are also reviewing whether we can improve aspects of our supplier due diligence that address human rights issues such as slavery and human trafficking. We will look to bolster contractual obligations where appropriate to reinforce ethical behaviour throughout our supply chain.

Approved by: Chris Gilligan, Managing Director, Southern Rock Insurance Company Limited