

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that CoventBridge has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. CoventBridge has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

CoventBridge Group Limited is a leading investigation provider, dedicated to serving the insurance community across the UK, Europe and internationally. From operational centres in the Newbury UK, Dublin, Ireland and Jacksonville, FL USA. Investigation services are delivered through 900 direct employees and a robust Vendor Managed Program, comprising over two thousand investigators. CoventBridge investigative activities are enshrined within a mature quality management system ISO 9001:2015 and employees work to a strict code of practice that ensure compliance to high ethical and quality standards.

### **Our high-risk areas**

We take areas of our business that conceivably represent elements of risk very seriously and include in this definition, any supplier who is not certified with the National Security Inspectorate to ISO 9001:2015.

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy which is compliant to the BS7858 standard of security screening and defined within a mature ISO 9001:2015 quality management system. The recruitment process includes conducting eligibility to work, checks to safeguard against human trafficking or individuals being forced to work against their will, employment, credit and criminal record checks. New employees are provided with training to ensure understanding of the Modern Slavery ACT.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. This is clearly documented within employees Staff Handbook and highlighted during induction to the company.
4. Code of business Ethics. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

### **Our suppliers**

CoventBridge operates a supplier policy and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes online searches to ensure that particular organisation has never been convicted of offenses

relating to modern slavery and on-site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- We may terminate the contract at any time should any instances of modern slavery come to light

**Training**

We conduct training for our procurement/buying employees so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

**Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Approval for this statement**

We are committed to ensuring that slavery and human trafficking have no place in our business or in our supply chain. This statement was approved by the Board of Directors of Coventbridge and will be reviewed annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Coventbridge (Europe) Limited's slavery and human trafficking statement for the financial year ending 31 December 2018.

Stephen Cook

