



# Modern Slavery and Human Trafficking Statement

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## Organisational Structure and Supply Chains

### Group Structure

First Underwriting Limited is an MGA and subsidiary of Kingfisher UK Holdings Ltd and forms part of the wider White Mountains Insurance Group Ltd. The Kingfisher brand trades in the UK under the regulated entity Kingfisher Insurance Services Limited. The Kingfisher brand is based within the UK and provides Insurance services to the UK Market. The Kingfisher brand does not deal with goods nor does it contain a supply chain which consists of countries deemed high risk of Human Trafficking or Modern Slavery.

### Supply chains

The Kingfisher group uses a number of suppliers in order to enable us to conduct our business and provide a good service to our customers and people. The majority of these suppliers are based within the UK. Those which are not, are not based in higher risk countries.

Our supply chain is varied and includes direct and indirect suppliers. We provide insurance services in the UK. We do not act as a manufacturer or retailer of physical goods.

## Objective

This statement sets out the steps that Kingfisher Holdings UK Ltd and any subsidiary companies trading as part of the Kingfisher Group has taken to gain assurance that slavery and human trafficking are not taking place in its supply chain and its own business.

The Kingfisher group will not tolerate slavery or human trafficking in its business or supply chains and we are committed to continually improve our policies and practices to aid the international fight against slavery and human trafficking as well as protecting human rights.

Kingfisher strives to be an employer seen to be promoting rewarding working environments, where our people feel valued and respected. We have a strong commitment to diversity and inclusions and look after the wellbeing of our people ensuring they feel safe and appropriately cared for.

## Policies

### Internal Policies

Kingfisher promotes good corporate citizenship and corporate responsibility within their business dealings. It sets out clear ethical behaviours for their colleagues within their Employee Handbook, Conflicts of Interest Policy and Whistleblowing policy.

Contained within the Employee Handbook colleagues are told about our grievance procedure, bullying and harassment, and equality complaints procedure.

Within our Whistleblowing Policy it encourages our colleagues to raise concerns about any suspected wrongdoing (such as any criminal offence or failure to comply with legal obligations) as soon as possible. We also give our colleagues contact details to be able to get independent advice about whistleblowing. A Whistleblowing log is kept and shared on a quarterly basis with the Risk and Compliance Committee, with any concerns reported to our Board and Regulators.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships, and how we implement and enforce effective systems and controls to minimise the risk of Modern Slavery taking place in our business or within any supply chain we are part of. All policies are included in our staff handbook which is available to all employees on the Company Intranet.

#### External Policies

Kingfisher is in the process of enhancing their policies for new and existing suppliers and this topic is included within the Compliance Risk Universe for review. Part of the enhancements will include suppliers to confirm whether they are a relevant organisation under section 54 of the Modern Slavery Act 2015 and, if so, whether they are compliant with the annual reporting requirements imposed by section 54.

A risk assessment will be conducted on suppliers (existing or potential) based on the goods or services being procured, and their approach around Corporate Responsibility. We will ask our suppliers to confirm they comply with the statement above.

## **Governance**

Recognising the importance of our culture, reputation and the environment to all our stakeholders, the Kingfisher Executive Team has taken oversight and responsibility. The Kingfisher Executive Team across all entities of the business are responsible for ensuring the day-to-day compliance of the procedures are being adhered to. The Kingfisher Executive Team ensure the board have adequate information to be able to provide assurance the group is meeting its obligations.

## **Risk Assessment and Due Diligence**

Due to the nature of our business, we consider the inherent risk of modern slavery and human trafficking occurring within our business to be low, however we take our responsibility to identify and effectively respond to any incidence of modern slavery and human trafficking very seriously.

We are looking to enhance our Risk Assessment approach which will take into consideration the likelihood of Modern Slavery occurring within our supply chain, paying particular attention to factors such as geographic location, nature of goods and services being supplied, supply chain length and the use of temporary or migrant labour. This will enable us to identify areas of concern within our supply chains. We will review our suppliers annually.

## **Training**

L&D and HR departments are committed to ensuring that all colleagues are aware of our commitment to not help facilitate the crimes of Human Trafficking and Human Slavery. Reminders and training is issued to all colleague on the below topics, which in turn touch upon this topic;

- Conduct Management Policy
- Code of Conduct
- Whistleblowing Policy
- E-learning on Modern Slavery and Human Trafficking will be included in the annual refreshers and at induction.

## Assessment of effectiveness in preventing Modern Slavery

We understand that Modern Slavery risk is not static and will continue our approach to mitigating this risk in the year ahead.

## Key Performance Indicators

In order to assess the effectiveness of the measures taken by Kingfisher, we will review the following key performance indicators:

- Staff Training levels
- Investigations undertaken into reports of Modern Slavery and remedial actions taken.

## Document Governance

Policy Owner	Head of Compliance
Approver	Kingfisher Executive Team
Date approved	December 2020
Date last reviewed	
Review frequency	Annual
Next review date	January 2022
Responsible for document management	Head of Compliance