

Granite Underwriting Limited's – Modern Slavery Act 2015 Annual Transparency Statement

For year ending: 31st December 2018

1. Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 (“MSA”). It sets out the steps taken by Granite Underwriting Limited, and its subsidiary companies, during year ending 31st December 2018 to prevent modern slavery and human trafficking in its business and supply chains.

Granite Underwriting Limited is committed to ensuring that no form of modern slavery takes place within its own operations or the supply chain. Modern slavery is defined as slavery, servitude, forced or compulsory labour and human trafficking.

2. About Us

The Granite Underwriting Limited Group provides specialist insurance, claims management and IT development services. This statement covers all entities within the Granite Underwriting Limited Group listed below, herein referred to as the “Granite Group”:

Acorn Insurance & Financial Services Limited

(“Acorn”) authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 311873)

Trading/Brand Names:

Lighthouse Insurance Services

Motorcade Insurance

Motorcade City

Motorcade Crystal Palace

Motorcade East

Motorcade Fleet

Motorcade London

Motorcade South

Motorcade West

Motorcade Leeds

Pay how you drive

TaxiMaster Insurance

Ladies First

Ladies F1rst

Acorn Insurance

Acorn Insurance Group

Granite Underwriting

Acorn is a specialist insurance intermediary offering car, taxi, van, motor trade, legal expenses, breakdown, excess reimbursement and home insurance. Acorn also provide claims management services.

Granite Finance Limited (“Granite Finance”)

authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 713766)

Granite Finance provides finance solutions for both personal and business customers to spread the cost of insurance over regular instalments.

<p>Prospect Legal Limited (“PLL”) authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 440702) <i>Trading/Brand Names:</i> <i>Haven Claims</i></p>	<p>PLL provides claims management services.</p>
<p>Flag Insurance Brokers Limited (“Flag”) authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 473756)</p>	<p>Flag is a specialist insurance intermediary offering taxi, private hire, minibus and courier insurance.</p>
<p>IT Developers Limited (“ITD”)</p>	<p>ITD provides software development, IT support, digital marketing and cloud services.</p>

3. Supply Chain

The Granite Group’s supply chain includes insurance brokers, insurers, comparison websites, vehicle replacement providers and solicitors. The majority of our suppliers are in the UK and are therefore also subject to the MSA.

4. Governance

The Granite Group’s internal policies include the Employee Code of Conduct, Anti-Bribery and Corruption, and Whistleblowing. All policies reaffirm our expectation that staff act with honesty and integrity whilst complying with legal and regulatory requirements at all times. We will shortly be adding to our policies with an Anti-Slavery policy which will reflect our commitment to:

- Act with integrity and ethically in all our business relationships,
- Ensure our Board, senior management and employees at all levels are aware of the principles of the MSA,
- Implement and enforce effective processes and controls to ensure slavery and human trafficking is not taking place anywhere within our business or in our supply chains,
- Maintain fair recruitment procedures and conditions of employment, and;
- Encourage the reporting of any actions which may contravene the MSA.

5. Due Diligence

The Granite Group are compiling an outsourcing policy to govern; the proposal process, contractual requirements, risk mitigation, and management of the supply chain.

We are dedicated to continue improving our approach to preventing modern slavery, therefore in 2019 we have committed to:

- Carrying out a supply chain review; incorporating anti-slavery clauses in to supply contracts and reviewing supplier MSA statements,
- Adopting a risk-based approach for selecting and managing the supply chain to ensure that risk, including the risk of modern slavery, is appropriately identified, assessed and mitigated,
- Completing a risk assessment on our operational framework, and;
- Incorporating annual reviews of internal anti-slavery practices, policies and the supply chain in our Compliance Monitoring Plan.

6. Risk Assessment

We are developing a risk assessment process covering both our operational framework and our supply chain.

7. Training

The Granite Group recognises that educating its staff is fundamental to ensuring that potential risks to human rights and modern slavery are identified and managed in a timely and efficient manner. Our current training programme includes our Code of Conduct with specific focus on conducting business in accordance with the highest ethical standards, and empowering staff to report any improper activity.

In 2019 we will develop and deliver further training on modern slavery to all staff. The training will ensure that staff understand the significance of the MSA and the importance of reducing the risk of modern slavery within the Granite Group.

Board Approval

The Directors of Granite Underwriting Limited approved this statement on the 29th March 2019.



Alan Keating
Director