

# The Granite Group's – Modern Slavery Act 2015 Annual Transparency Statement

For year ending: 31<sup>st</sup> December 2019

## 1. Introduction

This statement has been published in accordance with the UK's Modern Slavery Act 2015 ("MSA"). It sets out the steps taken by the Granite Group during the year ending 31<sup>st</sup> December 2019 to prevent modern slavery and human trafficking in its business and supply chains.

The MSA requires commercial organisations with an annual turnover of more than £36 million to publish a slavery and trafficking statement for each financial year. The Granite Group 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, force 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":

<p><b>Acorn Insurance &amp; Financial Services Limited</b> ("Acorn") authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 311873). <b>Trading/Brand Names:</b>  <i>Acorn Insurance</i>  <i>Acorn Insurance Group</i>  <i>Acorn Protect</i>  <i>Granite Underwriting</i>  <i>Haven Claims</i>  <i>Ladies First</i>  <i>Ladies F1rst</i>  <i>Lighthouse Insurance Services</i>  <i>Motorcade Insurance</i>  <i>Motorcade City</i>  <i>Motorcade Crystal Palace</i>  <i>Motorcade East</i>  <i>Motorcade Fleet</i>  <i>Motorcade Leeds</i>  <i>Motorcade London</i>  <i>Motorcade South</i>  <i>Motorcade West</i>  <i>Pay how you drive</i>  <i>TaxiMaster Insurance</i></p>	<p>Acorn is a specialist insurance intermediary offering non-standard car, taxi, van, motor trade, legal expenses, breakdown, excess reimbursement and home insurance. Acorn also provide claims management services.</p>
<p><b>Granite Finance Limited</b> ("Granite Finance") authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 713766)</p>	<p>Granite Finance provides finance solutions for both personal and business customers to spread the cost of insurance over regular instalments.</p>
<p><b>Flag Insurance (Brokers) Limited</b> ("Flag") authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 473756)</p>	<p>Flag is a specialist insurance intermediary offering non-standard taxi, private hire, minibus and courier insurance.</p>
<p><b>IT Developers Limited</b> ("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, repairers, counter fraud and intelligence providers, payment providers, cloud providers, software providers, and solicitors.

### **4. Recruitment Practices**

The Granite Group is committed to fair recruitment and employment conditions. We recognise the right of each employee to freedom of association, including the right to join trade unions. We ensure that we comply with employment legislation and we do not employ people who do not have the right to work in the UK.

### **5. Governance**

The Granite Group's internal policies include the Employee Code of Conduct, Anti-Bribery and Corruption, Financial Crime, and Whistleblowing. All policies reaffirm our expectation that staff act with honesty and integrity whilst complying with legal and regulatory requirements at all times. To further enhance our internal controls to mitigate the risk of slavery, we have recently implemented an Anti-Slavery policy which reflects 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,
- Enforce effective due diligence processes and controls to ensure slavery and human trafficking is not taking place anywhere within our business or in our supply chains,
- Carry out risk assessments to understand the company's exposure to the risk of modern slavery,
- Maintain fair recruitment procedures and conditions of employment, and;
- Encourage the reporting of any actions which may contravene the MSA.

We have also established outsourcing policy and procedures which govern; the proposal process, due diligence, contractual requirements, risk mitigation, and management of the supply chain.

### **6. Due Diligence**

In accordance with the Granite Group's outsourcing policy and our commitment to continuously improving our approach to preventing modern slavery, in 2020 we plan to:

- Carry out a supply chain review, reviewing supplier MSA statements,
- Incorporate the risk of modern slavery into the supply chain risk assessment, ensuring it is appropriately identified, assessed and mitigated,
- Assess the risk of slavery in our operational framework, and;
- Incorporate annual reviews of internal anti-slavery policies and the supply chain in our Compliance Monitoring Plan.

### **7. Risk Assessment**

We have a risk management system in place which identifies, assesses, measures, monitors and manages risks the business is exposed to, or could potentially be exposed to. This is documented in the risk register and the risk of slavery within the operational framework and supply chain has been assessed and included within the register for ongoing monitoring. During 2020 we will develop our risk management system further, including risk identified and the outcome of supplier due diligence.

## 8. 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 2020 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 and the minimum standards required to comply.

### Board Approval

The Directors of Granite Underwriting Limited approved this statement on the 24<sup>th</sup> June 2020.

A handwritten signature in black ink, appearing to read 'Alan Keating', with a stylized flourish at the end.

Alan Keating  
*Director*