

# Modern Slavery Statement



## **Modern Slavery Statement**

### **BY THE CEO OF THE MARKERSTUDY GROUP, ON BEHALF OF THE MARKERSTUDY GROUP OF COMPANIES**

As a Board we are committed to ensuring that slavery and human trafficking will not be tolerated within our Group of Companies and the following statement outlines our adherence to the Modern Slavery Act 2015 and the steps we take to mitigate risks of incidents within the organisation or its supply chains. The Companies covered by this statement are listed on the attached schedule.

### **ORGANISATION STRUCTURE**

Markerstudy is an accredited Investor in People - Gold, with more than 5,000 employees. Established in 2001, the group includes the UK's largest MGA, Markerstudy Insurance Services Limited, which supports over 1,000 broker partners and protects in excess of six million policyholders with a comprehensive range of products, from standard screen-rated to the very niche and hard to place manually underwritten risk.

In 2020, Markerstudy acquired Co-op Insurance's underwriting business and commenced a 13-year partnership to provide home and motor insurance products under the Co-op brand.

In 2021 it acquired BGL Insurance, a leading distributor of insurance to 3 million customers, and Lloyd's broker, Clegg Gifford.

Other sectors within the group include the Markerstudy Broking division, which comprises a number of brands including Brightside Insurance and Insurance Factory – one of the UK's largest pet insurance platforms – and complementary businesses Auto Windscreens, VisionTrack and Vision Vehicle Solutions. More information on our business can be found here [www.markerstudygroup.com](http://www.markerstudygroup.com)

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Markerstudy Group recognises that Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to Modern Slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains. This policy applies to all Markerstudy Group Companies whether they are regulated by the FCA or not.

Whilst the Markerstudy Group Holdings Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, our Senior Management Team and operating company CEO's work in conjunction with our support functions heads to ensure that our Modern Slavery Policy is complied with, and manage any concerns or breaches.

Additionally, the Markerstudy Group has a Whistleblowing Policy, which actively encourages the reporting of unethical behaviour.

## **SUPPLIER DUE DILIGENCE**

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and all our suppliers are expected to comply with all applicable laws.

As part of our contracting processes, we include specific prohibitions against Modern Slavery, including the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## **IMPROVEMENTS AND MONITORING**

We continue to review our supply chain protocols and to introduce specific measures to ensure that our obligations under the Act are passed through our supply chain.

These include efforts to:

- Ensure contractual warranties are included where appropriate in new engagements, which confirm that no slavery is used anywhere in the supplier's business, by any of the suppliers in its own supply chain, and that all necessary policies and processes have been implemented to ensure that this continues to be the case;
- Obtain a contractual right to request compliance-related information and the right to second party audit of suppliers at our discretion;
- Where appropriate, add indemnity provisions and rights to terminate engagements in the event of breach of our Modern Slavery Policy;

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation, we provide annual online Whistleblowing training to our employees. We have also made both the Modern Slavery Policy and Whistleblowing Policy available to all employees through the Markerstudy Intranet page, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2021.

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

Kevin Spencer

**GROUP CEO - Markerstudy Group**

**June 2022**

## **Markerstudy Group Companies included within this Statement**

Markerstudy Group Holdings Limited and its subsidiaries:

- ACM URL Limited
- Affinity Insurance Solutions Limited
- Auto Windscreens Services Limited
- BGL Direct Life Limited
- BFSL Limited
- BISL Limited
- Brightside Insurance Services Limited
- GingerMonkeys Creative UK Limited
- Injury QED Limited
- INTAA Limited
- Insurance Factory Limited
- Markerstudy (Affinity) Holdings Limited
- Markerstudy Direct Limited
- Markerstudy Group Limited
- Markerstudy Holdings (UK) Limited
- Markerstudy (Investments) Limited
- Markerstudy Insurance Services Limited
- Markerstudy Limited
- Markerstudy Group Investments Limited
- Vision Vehicle Solutions Limited
- VisionTrack Limited