

# Modern Slavery Statement 2024

This Statement has been published in accordance with Section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes NFU Mutual's Modern Slavery Statement for the financial year commencing 1 January 2024 and ending 31 December 2024.

NFU Mutual is committed to acting with integrity in all areas of its business. We recognise that Modern Slavery and Human Trafficking ('MSHT') is a serious crime. We understand our responsibility to have effective systems and controls in place to safeguard against any form of MSHT and to build upon our response to MSHT over time.

This Statement sets out the steps taken by NFU Mutual in 2024 to prevent any form of MSHT taking place in our business operations and supply chain.

## **Our Business and Supply Chain**

NFU Mutual is a financial services business offering a wide range of personal, business and farming insurance, investment, and financial services. NFU Mutual (Service Company) Limited is a wholly owned subsidiary company which employs all of the UK based employees of the NFU Mutual Group.

NFU Mutual operates through approximately 280 offices across Great Britain and Northern Ireland, the Isle of Man and the Channel Islands, supported by customer support centres and our online provision. We have over 4500 employees and an annual business turnover in excess of £2,400m.

Our own hiring practices are robust and existing procedures are designed to ensure that no modern slavery exists within our directly hired employee population.

Our supply chain is predominantly UK based and is managed by a team of NFU Mutual procurement and vendor management specialists.

## **Our MSHT Policies**

NFU Mutual expects and requires that our staff and suppliers always behave with integrity and in a lawful manner. We have several policies and due diligence procedures in place to manage the risk of MSHT which are available to all staff through the NFU Mutual intranet, comprising:

- NFU Mutual's 'Guiding Principles' for all employees. This places integrity at the heart of our business and requires our people work to high standards to ensure that we always do the right thing.
- Our Supplier, Outsourcing and Third-Party Policy which:
  - requires our suppliers meet our due diligence requirements at selection stage, including an awareness of and compliance with the Act;
  - requires our suppliers continue to meet our due diligence requirements throughout the supplier relationship; and
  - specifically sets out the process for reporting both MSHT and financial crime.
- Our recruitment and selection policies and processes which include screening checks to confirm individuals' identification and eligibility to work in the UK.
- Our Anti Money Laundering Policy includes specific reference to MSHT to make this issue significantly more visible to our staff.

These policies set out the standards required of our staff and include details of the mechanisms in place which can be used to report issues or concerns about MSHT linked to our business. We actively enforce our extensive policies and practices addressing how the business will operate in a sustainable manner. NFU Mutual remains committed to regularly assessing our policies and due diligence procedures to ensure that these meet legal requirements and reflect good industry practice.

### **Our Reporting Mechanisms**

Using a Speak Up Hub on the NFU Mutual intranet, we clearly communicate and signpost to our staff how they can raise any concerns regarding illegal, unethical or dishonest behaviour including MSHT related risks or issues. Our 'Speak Up Procedure' provides our staff with guidance on how they can raise concerns relating to the activities of NFU Mutual which are in the public interest. The Procedure explicitly signposts MSHT to staff.

If our staff feel unable, for whatever reason, to raise a MSHT concern directly with someone at NFU Mutual, we provide all staff with access to Safecall, an external and independent company which runs a 24 hour/7 days a week confidential reporting service.

### **Our Approach to Risk Management and Due Diligence**

NFU Mutual regularly assesses supplier risk and classifies suppliers to ensure that they are managed appropriately. We carry out due diligence and risk assessment of our suppliers in a variety of ways:

- NFU Mutual is a member of the Financial Services Qualification System ('FSQS') which is a community of financial institutions, including banks and insurance companies, collaborating to agree a single standard for collecting third-party information needed to demonstrate compliance to regulators, internal policies and governance controls. FSQS contains a set of questions on MSHT and labour standards for completion by our suppliers and this was reviewed in 2024 to gain a more thorough understanding of our suppliers' position. FSQS forms a key part of the due diligence process during the supplier selection and ongoing supplier management. This not only allows NFU Mutual to understand how our supply chain complies with the Act but also gives us data to challenge and ask more questions of our suppliers.
- Where NFU Mutual plans to spend more than £2,500 with a new supplier, we conduct an initial supplier risk assessment to identify whether additional due diligence is required on that supplier.
- Undertaking politically exposed person checks and sanction checks.
- NFU Mutual is a signatory of The Principles for Responsible Investment ('PRI') which is a United Nations supported international network of financial institutions which aims to promote sustainable and responsible investment practices. Our investment approach incorporates Environmental, Social & Governance ('ESG') considerations. When engaging with investee firms we make our ESG priorities clear, including our expectation that they comply with the Act.

In March 2024, we joined the Votes Against Slavery engagement for the second year running. In its fifth successive year, the initiative led by Rathbones was expanded in 2024 to include Alternative Investment Market ('AIM') companies alongside the FTSE350 companies targeted in 2023. This initiative targets UK-listed FTSE 350 firms to ensure that they are complying with the Act including, where they meet the legal requirements, the duty to publish a statement in accordance with Section 54(1) of the Act.

### **Our Contractual Controls**

Throughout 2024, we have continued to introduce strong MSHT clauses into our new and existing contracts, and at contract renewal, to support supply chain transparency. Our suppliers are required to:

- comply with the Act and all applicable laws, regulations, codes and guidance made under the Act or relating to it and to ensure that their staff have received appropriate training on the same.
- not engage in any activity, practice or conduct that would constitute an offence under the Act if such activity, practice or conduct were carried out in the UK.
- take all reasonable steps to ensure that MSHT is not taking place in its business or its supply chain.
- ensure that its sub-contractors (where there are any) are bound by equivalent terms.
- comply with any policy relating to Slavery and Human Trafficking as required by NFU Mutual

We require our suppliers provide us with evidence of their compliance with these requirements upon our request. We also require contractual auditing and access rights over our suppliers and their subcontractors to oversee and ensure MSHT compliance.

NFU Mutual further requires that its agency network also meets MSHT requirements through our Agency Agreement. This obligation extends to persons who are providing services or goods in connection with that Agreement.

### **Communication and Training**

In 2024 NFU Mutual continued to focus on raising awareness of MSHT across our business in a variety of ways:

- As part of the Senior Managers and Certification Regime, NFU Mutual is required to deliver a regulatory learning module for its staff which covers the Conduct Rules. The Conduct Rules set out the minimum standards for individual behaviour in financial services firms, which includes acting with integrity and with due skill, care and diligence. All NFU Mutual staff have a responsibility under this regulation to understand and take accountability for their own conduct, behaviour and practices at work. We require all NFU Mutual staff to complete the Conduct Rules e-Learning every 2 years and to complete an annual attestation. We also require all new starters to complete the Conduct Rules e-Learning and attestation as part of our induction curriculum.
- We have met our regulatory obligations by providing our staff with annual mandatory Financial Crime training which covers how staff can raise any financial crime concerns. This includes specific training material on MSHT to increase staff awareness and to provide a reminder of how to report concerns.
- We have a centralised hub within the NFU Mutual intranet, focussing on Responsible Business within Procurement, where staff can find information on MSHT and how to report any concerns.
- We have evolved our Responsible Business Strategy to consider factors across an ESG framework. To support the business with this approach, four strategic ESG ambitions were created that the company will work towards over the long term. One of the strategic ambitions is 'Doing Business the Right Way', which outlines that we will continue to incorporate ESG factors in our decision-making, how we operate our business and our supply chain, where we place our investments and the products and services that we provide. A key focus area under this ambition is human rights and working conditions. This area includes both NFU Mutual's working practices and our

employee rights, as well as those of individuals and businesses across NFU Mutual's entire supply chain.

- MSHT and guidance on how to report any MSHT concerns, is in the Procurement eLearning platform, which is mandatory annual training for those Business Relationship Managers who manage NFU Mutual's strategic or key suppliers.
- We continued to run a MSHT awareness campaign specifically for our agents. This provided guidance to agents on how to report any MSHT concerns and to signpost agents to NFU Mutual's Modern Slavery Statement.
- We continued to partner with Slave-Free Alliance, an international social enterprise which supports organisations to address risks of modern slavery in their operations and supply chains and to carry out targeted training to specific groups of NFU Mutual staff to deepen awareness of MSHT and educate those most likely to encounter instances of MSHT harms.
- In 2024, we hosted our first supplier summit focussing on Responsible Business. The aim of the summit was to continue to build our engagement with our key and strategic suppliers on how we can work together to achieve shared sustainability goals, whilst also adhering to our long-term business objectives. Slave-Free Alliance presented to our suppliers on MSHT and there followed productive roundtable discussions on MSHT to enable suppliers to share ideas, ask us questions and collaborate.
- As part of our supplier summit, we launched **NFU Mutual's Supplier Relationship Code**. This Code explains NFU Mutual's expectations on all our suppliers, as well as the requirements and ways of working that we, at NFU Mutual, apply to our supply chain including our focus on MSHT.

### **Effectiveness**

We have continued to assess our suppliers' responses to our due diligence to consider the risk of MSHT taking place within their businesses or supply chains. We have assessed our suppliers' general approach to MSHT, such as them having in place a Modern Slavery Statement displayed prominently on their website.

To ensure we track our progress against all areas of our Responsible Business Strategy, we have established meaningful targets. In 2024, our first set of long-term Responsible Business targets were published in our annual Responsible Business Report. Measurement processes are in place across the business and our performance will be disclosed in our Responsible Business Report annually. To read more about our strategy, what we delivered in 2024 and our longer-term aims, please read our Responsible Business Report.

To support our Responsible Business activity, NFU Mutual has an executive-level ESG Steering Group, which is chaired by our CEO, Nick Turner. The responsibility of the ESG Steering Group is to review how the business is performing against the targets we set ourselves, whilst monitoring ESG risks and assessing opportunities in line with industry benchmarks. The Steering Group will also challenge whether we are doing enough and moving fast enough in this space – balanced against our overall business objectives. We will continue to monitor regulatory requirements regarding the disclosure of Responsible Business topics to ensure we adhere accordingly.

We have ensured that any cases recorded through our whistleblowing reporting mechanisms raising issues relating to potential MSHT concerns are handled appropriately and efficiently. We regularly review our processes and operate a continuous improvement plan.

We also have wide-ranging financial crime frameworks in place designed to combat financial and related crimes across our business, supply chain and customers. These have resulted in the identification of a small number of MSHT concerns during 2024 which have been assessed on a case-by-case basis. Where appropriate, disclosures are made to law enforcement and partner organisations.

**Approval**

This Statement was approved by the Board of The National Farmers Union Mutual Insurance Society Limited on 30 April 2025 on behalf of itself and all of its subsidiaries and by the Board of NFU Mutual (Service Company) Limited on 30 April 2025.

The Statement was signed by Richard Morley, Finance Director and Nick Turner, Group Chief Executive on 30 April 2025.

**Richard Morley**  
**Finance Director**  
**30 April 2025**

**Nick Turner**  
**Group Chief Executive**  
**30 April 2025**