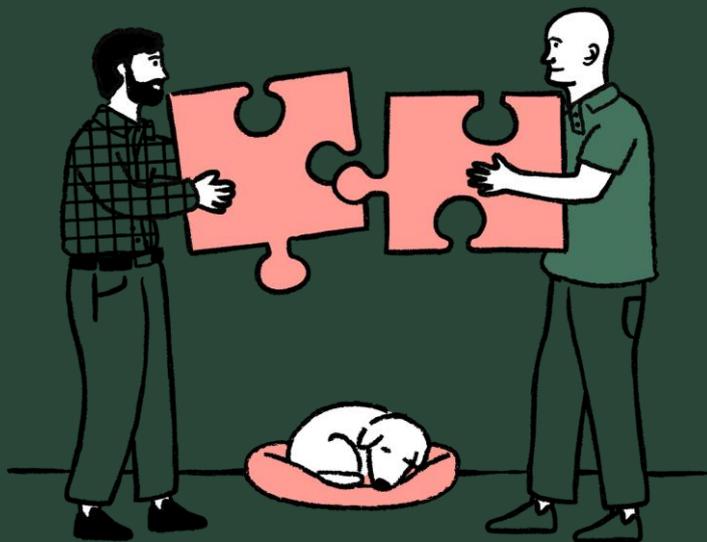


ManyPets

Stopping Modern Slavery



ManyPets

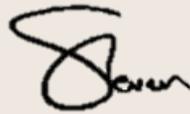
ManyGroup

We are committed to abolishing modern slavery.

We live in a very different world since we released our last modern slavery statement. We've witnessed wars, economic instability, changes in global employment, and a sharp increase in the cost of living.

We know that these factors will increase the risk of modern slavery and human trafficking, particularly from countries and communities where the impact has been felt the most. It's up to every one of us to do the right thing and support those in vulnerable situations.

Please read on and we'll explain some of the things we're doing to help the fight against modern slavery.



Steven Mendel, Group CEO and Co-Founder

This is our second Modern Slavery Statement and it's been published in accordance with the UK Modern Slavery Act ("MSA") 2015. Section 54 of the MSA requires every organisation with a global annual turnover of £36 million - which carries out business (or part of a business) in the UK - to produce a slavery and human trafficking statement for each financial year.

This statement applies to Many Group Ltd (referred to in this statement as the 'Company' or 'ManyGroup') and its subsidiaries (the Company and its subsidiaries referred to collectively in this statement as the 'Group' or 'we' and individually as a 'group company').

Who We Are

ManyGroup is the holding company for our brands that are keeping pets happy and healthy around the world. Through them, we offer award-winning insurance and pet health services such as preventative treatment subscriptions.

ManyPets provides insurance and more for cats and dogs in the UK, USA, and Sweden. Our core business is pet insurance, and we now insure over 596,000 pets globally. **Exotic Direct** is our exotic pet insurance that covers more unusual pets from birds to lizards in the UK. We recently acquired **VetBox** – and this partnership now brings us the ability to deliver preventative medication (such as flea treatment) to pet parents' doorsteps every month.

Many Group Ltd is our holding company for ManyPets Ltd, ManyPets Filial, ManyPets Inc. and VetBox Ltd. We trade under the brand ManyPets globally for our cat and dog insurance products, Exotic Direct for our exotic pet insurance products and VetBox for our pet health subscriptions.

Our Leadership

We have a Group Board with a non-executive Chairman, five non-executive directors and three executive directors. The Group Leadership Team is responsible for operational management of the business and with our country leadership teams for the implementation of our approach to Modern Slavery.

- Our UK operations are run as ManyPets Ltd in Haywards Heath (Sussex), Birmingham and London.
- Our Sweden operations are run as ManyPets Filial (a branch of ManyPets Ltd) in Stockholm.
- Our USA operations are run through ManyPets Inc. in Atlanta, Georgia. As of the published date of this statement, we are regulated to carry out our business of insurance producer and adjuster in 50 States and the District of Columbia.

We are regulated by the Financial Conduct Authority, the Swedish Financial Supervisory Authority (Sw. Finansinspektionen) and the Department Of Insurance in each of the 50 states and the District of Columbia.

Our Approach

We do not support or condone modern slavery in any form. It's wrong in every respect and is contrary to the operation of ethical business - and specifically contrary to our company values, which are:

- Show You Care
- Think Big
- Do the Right Thing
- Be Tenacious
- Work Together

We believe that our exposure to modern slavery and human trafficking is limited because of:

- The nature of our business and the services we provide
- The sectors and jurisdictions that we operate in
- The digital-first nature of our business
- Our physical and remote working environments
- Our talent discovery and acquisition processes
- Our company values and company ethos

Talking About Modern Slavery

We know that putting a stop to Modern Slavery is something we all take responsibility for. We can't do this without embracing diversity, inclusion, and equity and this is a key part of our strategy to encourage awareness and action against modern slavery.

We treat each other equally and believe that our differences make us a stronger company. We foster a culture that lets our people feel safe, speak up, and do the right thing. In doing this we show we care about each other, our customers and society. All business decisions for our customers and our teams are aligned with this approach.

We currently provide a variety of methods to help our people access learning resources to on modern slavery:

- ✓ Annual and new joiner training: hosted by Aviva to ensure compliance against expected regulatory standards. The objective of the course is to enable all staff to define modern slavery, identify different forms of modern slavery and recognise key pieces of legislation and approaches to deal with modern slavery.
- ✓ Annual refresher courses on the above modules, to be completed by all employees each year. We also audit these to ensure everyone attends and completes the modules.
- ✓ Awareness of our policies is shared through our onboarding programme for new joiners
- ✓ Our colleagues have a performance management framework ("Thrive") which is reviewed at regular intervals in the year, to ensure skills, knowledge and ability of our regulatory standards is maintained.
- ✓ Ongoing access to relevant modern slavery content on ManyLearnings - our learning management tool

Supplier Relationships + Procurement

We know that we have a responsibility to monitor and choose our suppliers and partners carefully - and make sure all relationships that we have as a business uphold our commitment to stopping modern slavery.

In 2021 we introduced a Procurement and Third Party Arrangements Policy. This policy forms part of our all-company compliance guidelines which help our people understand what due diligence and detailed checks need to happen before we enter into a material agreement with a new supplier or partner. Everyone in our company has been advised to follow this process and the Policy is accessible by all of our staff.

We have decided to undertake a review process to assist in understanding both the risk and the measures we need to take to avoid modern slavery. We have broken down our supplier contracts into three categories:

1. **Material Outsourcing** for services vital to the business which we could conduct internally but have elected to outsource externally.
2. **Critical Supplier** where an external party provides services which are also vital to the business and which we are not able to provide internally.
3. **Ancillary Supplier** which do not fall into either of the above categories and are regarded as lower risk.

Existing Material Outsourcing and Critical Supplier contracts

Over the next 12 months we plan to identify existing contracts which fall into either category, send a questionnaire on modern slavery to each relevant supplier and, where appropriate, ask for the inclusion of specific modern slavery provisions and exchange of information about their own procedures.

Ancillary contracts

Over the next 12 months we also plan to look at developing a programme to mitigate and avoid the risks of modern slavery in our supply chain under future ancillary contracts.

We do not plan to review existing ancillary contracts as we regard these as low risk for the purposes of exposure to modern slavery based on the suppliers we deal with under these contracts and the countries in which they operate.

Our People Processes

Hiring and Recruitment

We look to avoid modern slavery when sourcing and hiring talent by ensuring we have robust checks at every step of the process. Our aim is to ensure we safeguard others against human trafficking or individuals being forced to work against their will.

✓ Recruitment Partnerships

We do not engage any third party recruitment partner until we have our own ManyPets terms of business signed by both parties - and we won't work with anyone without our contract clauses agreed and in place. Given the specialist areas and operating locations of our current recruitment partners, we feel this is a low risk area for our company for the year ahead.

✓ Sourcing Talent and Application Management

We advertise our opportunities across multiple global websites (including our own internal jobs board) to encourage applications from a wide talent pool. All applications are managed by a central SaaS platform which allows us to track the source of every inbound application and their personal details. We do this so we can make sure we're speaking directly with the applicant and not a third party. Any changes to a candidate's personal details will require the request to be managed by a member of our Talent team. Email addresses, telephone numbers and personal information cannot be edited by a user or third party from outside of our company.

✓ Interview Process

Our internal Talent team arrange an initial meeting with all candidates we want to progress to an interview. We typically hold these meetings via Zoom and ask that no other person is present other than the candidate and our recruiters. The team will verify their suitability for the role, right to work, and identity prior to engaging them in a formal process. We offer both two and three-stage interview processes depending on the level of the hire. Throughout the process we request that all candidates interview on their own with our hiring panel - and we ask that all interviewers join the meetings with both video and audio capability enabled. If we see something that doesn't feel right, this is escalated internally to the Head of Talent Acquisition to explore and investigate.

✓ Extending Offers

We extend offers of employment and contractor agreements directly with the person we hope to employ or engage. The only exception will be if someone has been introduced via a recruitment partner. In this situation, we expect the recruitment partner to uphold the same due diligence we have when speaking to candidates ourselves. Our formal offer letters are followed up in writing directly to the candidate - and we do not share this with anyone else other than the individual we're offering.

✓ Contracts and Pre-Employment Checks

All new joiners to our company are issued with either a contract of employment or a contractor agreement which is compliant with applicable local laws. Our contracts contain both their contractual and statutory rights (such as holiday pay, sickness pay) and any other benefits to which they may be entitled. Contracts are shared for secure signature via DocuSign.

For all new employees, we check the candidate's previous five years' work or study history is verified and carry out pre-employment checks. Specifically in Sweden, we also require a recent police report to be shared prior to joining - which acts as another line of defence against modern slavery.

Reward and Recognition

Our reward process is fair and consistent - and we uphold industry standards on employee wages, benefits, working hours and minimum age. This approach is followed in all countries where we operate, without any unauthorised deductions.

We avoid modern slavery by paying a fair, externally benchmarked salary for the country where the role is based. We use a recognised system to benchmark the salary range for all roles which helps us understand where each role sits in the bigger company structure. From here, we work out the median pay bracket for each role.

We review the salary range and overall package when we initially scope out a new role. Once agreed, this then flows into our salary and remuneration review process. This makes sure that we are paying people fairly for the job that they do – and that it's reviewed regularly. We also undertake regular "pay audits" which show us trends and patterns to identify roles that can be above or below market pay; ensuring again that we pay people fairly for the job that they do.

We know that there is a greater risk of modern slavery for certain demographic groups. We do not (and will not) ever pay someone differently based on their gender identity. To make sure we're doing the right thing, we intend to report and publish our inaugural gender pay gap analysis.

Our People Policies

We have created and update the following company policies each year which support our mission to stop modern slavery. These ensure we have clear guidance for our people on what we expect:

- Whistleblowing Policy - published to encourage employees to report concerns about individual or company practices that could promote or support modern slavery.
- Our Approach to Inclusion – our zero tolerance approach to harassment, bullying and discrimination based on protected characteristics.

Raising Concerns or “Whistleblowing”

We are regulated by the Financial Conduct Authority, so it's vital that our people know how to raise a concern about how we're doing business should the need arise. As part of our onboarding process, we explain to everyone across our company how to raise a concern or flag unethical conduct and modern slavery related risks.

Our Inclusion Council

We established our first Inclusion Council in 2021. The Council is formed of a cross-functional team of 15 employees from our global business and chaired by two executive sponsors and a steering committee. Rather than segmenting our group by areas of inclusion (e.g., LGBTQIA+), we created three core working groups, each with a different focus to drive meaningful change.

Our purpose is “to build an inclusive culture throughout our business, with a focus on being actively anti-racist by driving change and challenging inequity.”

Our Commitment to Environmental, Social and Corporate Governance

The climate crisis is a threat to life on this planet as we know it. Greenhouse gas emissions across the world have been steadily rising and we can now actively see the impact this is having on the planet. Rising temperatures are leading to an increase in natural disasters and extreme weather

conditions, and we are seeing vast environmental degradation to the natural environment around us. This rise in natural disasters and extreme weather conditions can have a negative impact on the socio-economic vulnerabilities in some countries – leading to marginalisation and an increased risk of modern slavery.

We have aligned with the United Nations Sustainable Development Goals, and through a series of different programmes are committed to being carbon neutral by 2023. Our ambition is to be Pet Zero by 2030 – this means giving all our pet parent customers the tools to help reduce the environmental impact of their pets. We plan to make this happen through a mix of initiatives including identifying community and environmental projects, fundraising and charity partnerships, carbon “pawprint” calculators and introducing offset features within our product offering.

Key Performance Indicators

We intend to use the following key performance indicators ("KPIs") to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- ✓ Contracts
 - Due diligence carried out on new suppliers for Material Outsourcing and Critical Supplier contracts to satisfy ourselves that we can continue to engage with them.
 - Appropriate anti-slavery clauses to be included in each relevant contract.

- ✓ Talent Acquisition:
 - 100% of colleagues have a verified right to work.

- ✓ Learning and Development:
 - Training courses that raise awareness are assessed via questions with a baseline pass rate of 80%. This is reportable via the learning platform.
 - CPD records include reflection on training completed by named individuals that will evidence their awareness of and participation in the training.

- ✓ Whistleblowing:
 - Assess and respond to all incidents of modern slavery which are included in whistleblowing reports.

Future Plans

Over the next 12 months, we're going to continue to test and improve our internal risk and control framework - and carry out the contractual checks referred to above. We intend to carry out a bi-annual review of our modern slavery compliance and report our findings and changes in approach to the Board, to ensure we're keeping on track with our commitments.

Looking ahead to the coming year, we also have several exciting initiatives planned to support our updated policy:

YourVoice

We are exploring a product enhancement to our People system “Bob” which will allow everyone in the business to have a simple, streamlined way to report whistleblowing across the company.

Giving Back

We're going to build on our ESG initiatives and partner closely with the Inclusion Council to formalise our approach to giving back to the community. This includes schools' outreach, volunteering opportunities, and charitable support.

Refresh + Relaunch

To further promote our updated policy and to align with Anti-Slavery Week in the UK, we intend to share video resources, access to webinars, and invite an external speaker to deliver an awareness talk to our people on Modern Slavery. This content will be included in our Diversity, Equity and Inclusion calendar of events and we'll record the content for our future new joiners.

Further reading and related policies

- Procurement and Third Party Arrangements Policy
- Our Approach to Inclusion
- Whistleblowing Policy
- Disciplinary and Capability Policy

All the policies related to this document can be accessed by our employees through our People system "Bob" under "Company Documents". If you are reading this as someone from outside our business, [please email us](#) and we'll be happy to share a copy of any policy via email, by reply.

Help and assistance

If you or someone you know is being or has been exploited or you are unsure if someone needs help, here are some contacts for you to approach:

Call 999 and ask for "police" for life-threatening emergencies.

Call 101 for non-emergencies.

[Modern Slavery Helpline](#) - 08000 121 700 or contacted via an [online form](#)

[Victim Support](#) - 0808 16 89 111 or contacted via an [online form](#)

[Crimestoppers](#) - 0800 555 111 or contacted via an [online form](#)

[Migrant Help](#) - 0808 8010 503

[The Salvation Army](#) have a 24/7 confidential referral helpline: 0800 808 3733

Approved by the boards of Many Group Ltd, ManyPets Ltd, Brooks Braithwaite (Sussex) Limited, ManyPets Inc. and VetBox Ltd.

Steven Mendel, Group CEO, Co-Founder and Director of each company

Dated 29th September 2022