ManyPets

Stopping Modern Slavery

ManyPets

We remain committed to abolishing modern slavery.

We continue to live in a world that has economic instability, a sharp increase in the cost of living, changes in global employment, and where countries remain at war.

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 continue to help the fight against modern slavery.

This Modern Slavery Statement has 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 half a million pets globally.

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 and VetBox for our pet health subscriptions.

Our Leadership

We have a Group Board with a non-executive Chairman, four other 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 and we operate in 47 of these.

We are regulated by the UK Financial Conduct Authority, by the Swedish Financial Supervisory Authority (Sw. Finansinspektionen) and in the US by the relevant State Departments Of Insurance.

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
- Do the Right Thing
- Be Tenacious
- Think Big
- 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 equality and inclusion and this remains a key component of our strategy, through encouraging 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. 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 on modern slavery:

- ✓ Annual and new joiner training ensures compliance with expected regulatory standards. The objective of this course is to enable all employees 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 which audit the completion of the modules above for all employees, regardless of tenure. By doing this each year we ensure our knowledge remains fresh and any changes to legislation or learning content is captured.
- ✓ Awareness of our policies is shared through our onboarding programme for new joiners.
- ✓ We have 24/7 online access to relevant modern slavery content on ManyLearnings - our learning management tool.
- ✓ Our colleagues have a performance management framework ("Thrive") which is reviewed at regular intervals in the year, to ensure the skills, knowledge and ability of our regulatory standards are maintained.

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 early 2023 we created a new Procurement department and have since hired a dedicated Procurement team, which is led by Paul Chappel (Procurement Director). Since establishing the team we have updated our Procurement Policy. This policy forms part of our all-company compliance guidelines. These guidelines help our people understand what due diligence and detailed checks need to happen, including on modern slavery, before we enter into a material agreement with a new supplier or partner.

We have shared communications across our company to advise our teams and colleagues to adhere to our best practice. Additionally, we have created a Procurement Portal on our intranet (ManyNet) which allows all of our teams to access our documents and policies, and provides an easy way for anyone to get in touch with the team with any questions or concerns.

We have recently invested in a dedicated procurement platform which centralises contract lifecycle management. This will help us with the ongoing monitoring and oversight of our suppliers and partners contracts. The platform will also provide an automation of our onboarding process and stores all the relevant associated documents in a secure, centralised way.

Since last year's statement we have taken the opportunity to revisit our supplier contracts and split them into four clear categories:

1. **Strategic** are defined as those suppliers who have a significant spend, have a high degree of existing innovation or collaboration or are providing a material outsourced service. Strategic suppliers have a high level (high risk) of customer impact with their products or services.
2. **Mission Critical** are defined as suppliers who without their products or services would represent a high risk to either clients or ManyPets internal environment, this also includes suppliers who provide a material outsourced service.
3. **Preferred** are defined as suppliers who have medium levels of spend, with some innovation or collaboration, and have medium levels (medium risk) of customer impact with their products or services.
4. **Tactical** are defined as suppliers who supply 'off-the-shelf' system or product components. They have low levels of spend, minimal risk, with little or no customer impact.

We have also created our first ManyPets Vendor Code of Conduct. In this Code, we set out our expectations regarding modern slavery with the suppliers. It is shared as part of our procurement process, and we expect all vendors and suppliers to embrace the spirit of our own commitment.

For Strategic and Mission Critical suppliers, we request copies of their own statements to understand their procedure and approach.

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 Terms of Business signed by both parties - and we won't work with anyone without modern slavery clauses in place. Given the specialist nature 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.

✓ 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 the role to.

✓ 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. From here, we work out the median pay bracket for each role. We review the salary range when we start the initial search for the role. Once agreed, the role is flowed into our annual 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 have reported and published our inaugural gender pay gap analysis in April 2023.

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 in the UK, 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 know how to raise a concern or flag unethical conduct and modern slavery related risks. We intend to publish a new

Whistleblowing form on ManyNet to ensure that any feedback or concerns can be raised at any time, from any region.

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 are working on a number of initiatives including identifying community and environmental projects, fundraising and charity partnerships, carbon "pawprint" calculators, and introducing offset features within our product offering.

Since last year, every one of our employees now has the opportunity to take advantage of two days fully paid to support our charity partners, or a charity of their choice. We also continue to share relevant content and events to support our approach to ESG and Inclusion on ManyNet.

Key Performance Indicators

We 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 Strategic and Mission Critical Supplier contracts to satisfy ourselves that we can continue to engage with them.
  - Appropriate anti-slavery clauses to be included in each of these contracts.
    - Status: in 2023 we have established a new procurement team, updated our procurement policy and invested in a dedicated procurement platform.

- ✓ Talent Acquisition:
  - 100% of workers have a verified right to work.
    - Status: this has been completed and 100% of workers have a verified right to work.
  - All workers who do not have the right to work in the UK without a visa will be audited annually to ensure no changes to their status.
    - Status: we are undergoing a full internal audit over the next eight weeks and will ensure that any further actions are captured and escalated by November.

- ✓ Learning and Development:
  - Training courses that raise awareness are assessed via questions with a baseline pass rate of 80%. This is reportable via our learning platform.

    - CPD records include reflection on training completed by named individuals that will evidence their awareness of and participation in the training.
        - Status: each of our team leaders are given the responsibility of checking CPD training is up to date and tables of completed training are published regularly on our internal channels.
- ✓ Whistleblowing:
    - Assess and respond to all incidents of modern slavery which are included in whistleblowing reports.
        - Status: all known reports have been responded to.

Further reading and related policies

- Procurement 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".

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, ManyPets Inc., Many Group Services Inc., Many Group US Holdings, Inc. and VetBox Ltd.

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

29 September 2023