

ManyPets

Modern Slavery Statement



ManyPets



In a world marked by economic turbulence, shifting employment landscapes, and ongoing global conflicts, the risk of exploitation and human trafficking remains high.

These challenges disproportionately impact vulnerable communities, making it more important than ever for companies and organisations to act with purpose and integrity.

As the newly appointed Group CEO for ManyPets, I am committed to ensuring we have robust practices and risk mitigation plans in place so we continue to protect and contribute to a future that is free from modern slavery.

Luisa Barile | Group Chief Executive Officer

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 Group brands: 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 core business is pet insurance, and we now insure over half a million pets globally.

We are regulated by the UK Financial Conduct Authority and in the USA our home regulator is the Delaware State Department of Insurance.

- Our UK operations are run as ManyPets Ltd in Haywards Heath (Sussex), Birmingham and London.
- 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.

Our leadership

We have a Group Board with a non-executive Chairperson, 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 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 We Care
- Do the Right Thing
- 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 encouraging awareness and action against modern slavery.

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.

ManyPets

- ✓ We have 24/7 online access to relevant modern slavery content on Kallidus - our learning management tool.
- ✓ The objective of these courses 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.
- ✓ Awareness of our policies is shared through our onboarding programme for new joiners and via regular internal communications.
- ✓ Our colleagues have a performance management framework ("Thrive") which is reviewed at regular intervals in the year, to ensure our skills, knowledge and 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 and build a new section on our company intranet. 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 a dedicated procurement platform which centralises contract lifecycle management. This helps us with the ongoing monitoring and oversight of our suppliers and partners contracts. The platform also provides an automation of our onboarding process and stores all the relevant associated documents in a secure, centralised way.

We split our supplier contracts 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 also operate a 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

We mitigate the risk of 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.

Given the specialist nature and operating locations of our current recruitment practices, we feel this is a low-risk area for our company for the year ahead.

We advertise our opportunities through global websites (including our own jobs board) to encourage applications from a wide talent pool. All applications are managed by a central 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.

We arrange an initial screening call 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. We will verify their suitability for the role, right to work, and identity prior to engaging them in a formal process. 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 Director of People Operations.

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.

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.

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 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. 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 and we share a detailed breakdown of our gender pay gap reporting in the UK via the government portal.

Policies

We have created and update the following company policies which support our mission to stop modern slavery.

- Whistleblowing Policy – published on our HRIS and intranet to encourage employees to report concerns about individual or company practices that could promote or support modern slavery.
- Our Approach to Inclusion – published on our HRIS, this is our zero-tolerance approach to harassment, bullying and discrimination based on protected characteristics.
- Sharing Sensitive Data Policy – we have launched and communicated a new policy which sets out our processes and restrictions to safeguard personal information for our employees and potential new employees.

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 how to raise a concern or flag unethical conduct and modern slavery related risks. Employees can access a Whistleblowing form on our intranet to ensure that any feedback or concerns can be raised at any time, from any region. We have also built a separate Risk and Compliance section and we now have a page dedicated to both Whistleblowing and Modern Slavery.

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. Our ambition is to be Net Zero by 2030. Each of our employees also has the opportunity to take two days fully paid leave to support our charity partners, or a charity of their choosing.

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:

- 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.
- We have an established procurement team and operate a procurement policy and dedicated procurement platform.

How we've measured our impact over the last 12 months

ManyPets

- 100% of employees have a verified right to work check through Zinc.
- 100% of workers and employees who do not have the right to work in the UK without restriction are audited annually to ensure no changes to their status.
- Training courses that raise awareness are assessed with a baseline pass rate of 80%. This is reportable via our learning platform, Kallidus.
- CPD records include reflection on training completed by named individuals that will evidence their awareness of and participation in the training.
- We have had no whistleblowing reports related to modern slavery. Any that are raised will be actioned, logged, shared with our senior leadership.

Further reading and related policies

- Procurement Policy
- Our Approach to Inclusion
- Sharing Sensitive Information Policy
- 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 and VetBox Ltd.

Luisa Barile
Group Chief Executive Officer

[DATE]