Statement Period: 1 Jan 2024 – 31 Dec 2024

Review date:

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that CoventBridge Group Limited ("CoventBridge") has taken and is continuing to take to ensure that modern slavery or human trafficking does not occur within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking, and forced labor. CoventBridge has a zero-tolerance approach to any form of modern slavery. CoventBridge is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

CoventBridge's Business

CoventBridge is a leading investigation provider, dedicated to serving the insurance community internationally, with an operational center in Jacksonville, Florida, USA. Investigation services are delivered through over 900 direct employees and a robust Vendor Managed Program, comprising over two thousand investigators.

CoventBridge's Policies on Slavery and Human Trafficking

The majority of our suppliers and employees are located in the United States and CoventBridge sees the risk of modern slavery in this supply chain as low. Nevertheless, CoventBridge operates a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies include:

1. Whistleblowing Policy. CoventBridge operates a whistleblowing policy so that all employees know they can raise concerns about how colleagues are being treated or practices within our business or supply chain without fear of reprisals. This is clearly documented in the Employee Handbook and highlighted during induction to the company.
2. Code of Business Conduct and Ethics. This code explains how CoventBridge behaves as an organization and how we expect our employees and suppliers to act. It is available to employees both as part of the Employee Handbook and as a separate policy accessible to all staff.
3. Recruitment Policy. CoventBridge operates under a robust recruitment policy, which includes conducting eligibility to work, checks to safeguard against human trafficking or individuals being forced to work against their will, and employment, credit, and criminal record checks.

CoventBridge's Vendors

Given the nature of CoventBridge's business, vendors and suppliers used by CoventBridge are less likely to be susceptible to the risk of slavery and human trafficking. However, CoventBridge remains mindful that others may not uphold the same standards. Therefore, CoventBridge takes steps to validate that such values are maintained through appropriate due diligence and conducting a risk-based assessment of its vendors and suppliers. CoventBridge conducts due diligence on all vendors (U.S. and international) before allowing them to become an approved vendor on its panel. Before being approved, each vendor must sign an agreement that confirms to us that:

- They will not, at any time during any investigation conducted on behalf of CoventBridge or its clients, represent or appear to represent any action or activities that are illegal, unlawful, or perceived to be illegal or unlawful.

- They will act ethically at all times while working on assignments provided by CoventBridge.

Should it be determined that the vendor or an employee of the vendor acted unethically or immorally or should any instances of modern slavery come to light, CoventBridge retains the right to suspend or remove the vendor from the approved panel at its discretion.

CoventBridge's Measures to Prevent Modern Slavery and Human Trafficking

CoventBridge takes action to ensure that modern slavery is not taking place in our workplace or our supply chain. These actions include:

- Providing Training to All Employees. CoventBridge maintains a Code of Conduct, which was drafted after considering many different standards relating to the ethical and humane treatment of people. All CoventBridge employees are trained on the Code of Conduct upon hire and at least annually thereafter.
- Providing Awareness to All Employees. As noted above, CoventBridge maintains a Code of Conduct. All CoventBridge employees are made aware of the Code of Conduct upon hire and it is readily available on our Employee Resources Website.
- Monitoring. CoventBridge encourages employees to submit reports related to our Code of Conduct or any applicable laws to a confidential Integrity line operated by a third party. To date, no reports have been received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Reviewing Procurement Processes. CoventBridge continues to review and refine its procurement process to ensure a consistent approach to tackling modern slavery and human trafficking, including due diligence and a risk-based assessment of CoventBridge's suppliers to define appropriate levels of oversight throughout the contract life cycle.

By articulating clear policies and embedding preventative controls within business processes, CoventBridge can continue to monitor and mitigate the risks of slavery and human trafficking within its supply chain.

Approval for this statement

CoventBridge is committed to ensuring that slavery and human trafficking have no place in our business or supply chain. The Chief Executive Officer of CoventBridge (USA) Inc., approved this statement, which will be reviewed annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CoventBridge Group Limited's slavery and human trafficking statement for the financial year ending 31 December 2024.



Douglas G. Merriman
Chief Executive Officer