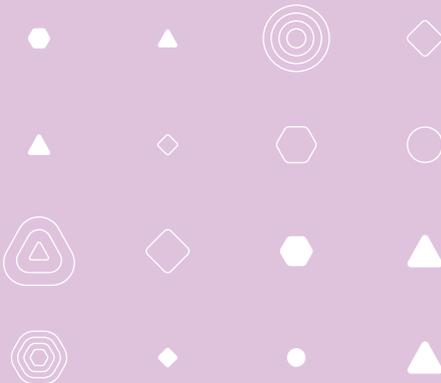




Modern Slavery and Transparency in Supply Chains Statement





Purpose and scope

This Modern Slavery and Transparency in Supply Chains Statement (“Statement”) is made in accordance with the Modern Slavery Act 2015 (the “Act”). The Statement relates to the activities of Simplyhealth Group Limited and its subsidiary companies.

This Statement sets out the steps we continue to take to prevent modern slavery and human trafficking in our business and supply chains. Although the proposed Modern Slavery (Transparency in Supply Chains) Bill is no longer proceeding, we have adopted its enhanced transparency provisions; our approach aligns with the aims of the independent review of the Act launched by the Home Office in July this year.

Our approach

We tackle modern slavery and human trafficking by educating and informing our employees, making clear commitments and progressing against those commitments and owning the challenges faced. This Statement is once again written in the spirit of transparency; it acknowledges that while we have progressed we are committed to improving our practices and there are still areas on which we need to work.

Who we are

Simplyhealth exists to improve access to healthcare. We make accessing healthcare easier for millions of people in a sustainable way that delivers long term impact.

What we do

We do this by funding healthcare interventions directly (through our charitable partners and giving), by influencing (working with public authorities, local and national government) and through insurance-based health plans that help people access and get funding for healthcare.

Our plans cover areas including but not limited to; dental, optical, musculoskeletal, counselling and some overall health assessments, as well as plans that cover pet health. We provide direct to the consumer, via corporate employee benefit schemes, or by health practitioners themselves.

Supply chains

Simplyhealth always attempts to source goods and services from suppliers on our Approved Supplier List (“ASL”).

Suppliers are added to the ASL following appropriate and defined due diligence and contractual checks. By way of a checklist within our control framework, we can evidence that appropriate programmes are in place to manage the risk of modern slavery and human trafficking; this requirement extends to ensuring that our suppliers have similarly appropriate arrangements.

We believe that effective procurement at Simplyhealth includes ethical, socially responsible behaviours in all supplier interactions including:

- Engagement and compliance with the Bribery Act 2010;
- Engagement and compliance with the Modern Slavery Act 2015;
- Engagement and compliance with outsourcing regulatory requirements; and
- Avoidance (or declaration) of any conflict of interest.

Training, Guidance and Principles relating to Modern Slavery and Human Trafficking

- All employees within our procurement function have a full understanding of the issues affecting us in relation to modern slavery and human trafficking.
- Our legal function has a full understanding of the impact of modern slavery and human trafficking, together with the need for our business to implement the provisions of the Act with a purposive approach, not merely at a compliance level.
- We believe that our strength is in our people and their vigilance will ensure successful engagement. As such all employees have access to our modern slavery and human trafficking documentation via our corporate intranet. We have provided guidance to our employees regarding our corporate duties and our expectations in relation to employee action and awareness. The guidance includes links to the Modern Slavery Helpline website, the government modern slavery website and this statement; together with information regarding internal communication and reporting.
- Simplyhealth has produced a modern slavery and human trafficking policy which is available to all staff and clarifies our zero tolerance approach in a clear, short form document.
- Our Board of Directors has been made aware and fully briefed on the nature and requirements of the Act, and the impact on our group.

The following supplementary principles and toolkits are available to all employees:

- Running our Business – we have an updated Whistleblowing Policy in place to allow all employees to be able to report any concerns about how their colleagues are treated, or to report any concern regarding our business practices. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. The whistleblowing toolkit is designed to make it easy for employees to make disclosures without fear of retaliation;
- Our People - we strive for the highest possible standards of employee conduct and ethical behaviour as laid out in Our People Principles;
- Agency Workers – we use only specified, reputable employment agencies to source labour and we always verify the practices of any new agency we are using before accepting workers from that agency; and
- Our approach to corporate social responsibility underpins how the organisation takes account of the economic, social and environmental impact of our operation.

Process Owners

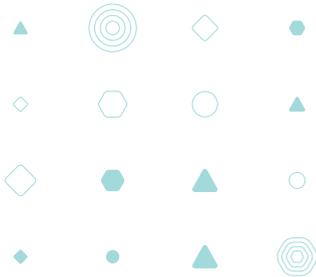
We have maintained our internal governance structure at both operational and leadership levels. The General Counsel, together with the senior management of each business unit (in conjunction with our procurement function) remain responsible for engagement.

Assessment of risk

We have conducted a risk assessment of modern slavery and human trafficking in relation to our procurement process, supply chains and internal workings.

Simplyhealth is not heavily reliant on third party suppliers. Our business has developed since publication of our previous Statement, with Simplyhealth moving its focus away from direct product retail. This decreased reliance on external manufacturers has reduced our overall risk.

We do however continue to rely on IT as well as some outsourced services. We are aware that there are modern slavery and human trafficking risks in these supply chains. Wherever possible we attempt to purchase these goods and services from large, global suppliers.



Going forward we are proposing to implement a checklist within our procurement records, to ensure each internal buyer has undertaken due diligence on a new supplier. We accept we have limited ability to influence how our suppliers structure their supply chains. It is hoped however that by compliance with, and promotion of, the Act we will play our part in influencing all suppliers in the way they manage their supply chains.

We are yet to undertake a risk assessment of worldwide services used by our customers. We hope to do this in the near future, with particular reference to the provision of treatment provided by partners providing worldwide dental injury and dental emergency cover.



Evaluation

To evaluate the effectiveness of the measures we are taking, our process owners will be responsible for modern slavery and human trafficking engagement, and publicising this across the group.

We have maintained a framework for organisational accountability, to allow for employees and others to raise issues, make suggestions, voice grievances and report suspected or actual modern slavery or human trafficking.

We have raised awareness amongst our people, of the risks of modern slavery and human trafficking, the requirements of the Act and its objectives, together with our procedures to ensure compliance.

We aim to map our supply chains for goods assessed as potentially higher risk, with reference to the Global Slavery Index.

Approved by the Board of Simplyhealth Group Limited



Romana Abdin
Chief Executive

12th October 2018



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