This statement by Hastings Group Holdings plc ("HGH") as the parent company of the Hastings Group (the "Group") is made pursuant to section 54(6) of the Modern Slavery Act 2015. It constitutes the Group’s slavery and human trafficking statement for the financial year ending on 31 December 2018.

OUR COMMITMENT

We will not tolerate slavery and human trafficking within our business and supply chain. We are committed to acting responsibly in business relationships and ensuring that slavery and human trafficking does not occur anywhere in our business operations. We will also require our suppliers and business partners to take the necessary steps to avoid and/or tackle slavery and human trafficking.

We will continue to enforce the Group’s polices, processes and procedures throughout the coming year in support of our commitment.

STRUCTURE, BUSINESS AND SUPPLY CHAIN

We are a general insurance provider of products and services to the UK retail market, specifically for car, van, motorbike and home insurance. We have two trading businesses: Hastings Insurance Services Limited ("HISL"), trading as Hastings Direct, an insurance intermediary and service provider operating from three locations in the UK (Bexhill-on-Sea, Leicester and London); and Advantage Insurance Company Limited ("AICL"), an insurance underwriter based in Gibraltar. HGH is the ultimate parent company and is responsible for oversight of the Group's operations; its head office is located in Bexhill-on-Sea, East Sussex.

Our business model focuses on providing general insurance products and services to customers in the UK only, via price comparison websites, over the telephone, and via digital interface. The Group operates UK call centre operations for retail sales and customer service and claims handling functions, and has outsourced arrangements to supplement these operations in the UK and in South Africa.

We support, and are committed to, the welfare of all of our colleagues in terms of pay, working hours, environment, health and safety, and wellbeing. We do not expect, and will not tolerate, violations of basic human rights or UK employment practices by any colleague or within our supply chain. The number of colleagues directly employed by the Group as at 31 December 2018 was over 3,300. Our colleagues are engaged on a variety of full-time, part-time, and flexible working arrangements and are appropriately remunerated and incentivised; the Group does not operate zero-hour contracts. Some of our colleagues, primarily those based in our call centres, are employed on a seasonal basis to accommodate, for example, students during holiday periods. Contractors are also employed by the Group from time to time, but these are generally professional workers for specific
Group from time to time, but these are generally professional workers for specific projects.

The Group has a transparent and inclusive culture based on its 4C's cultural framework ensuring the needs of Colleagues, Customers, Community and Company are taken into account [www.hastingsplc.com/corporate-responsibility/4cs](http://www.hastingsplc.com/corporate-responsibility/4cs). We listen and respond to issues and concerns our colleagues raise, either through formal annual surveys and colleague forums, or via ad-hoc open communication directly with the Chief Executive Officer. The Group does not formally recognise a trade union, but all colleagues have the right to be represented by a trade union member should they choose to do so.

HISL's primary suppliers include price comparison websites, data centre providers, outsourced call centre service providers, vehicle repair centres, car hire providers, and law firms. All of these suppliers, with the exception of the South African call centre operation, are based in the UK.

AICL's external supply relationships include reinsurers who, with the exception of some reinsurers, are all based in the UK.

HGH's primary external supply relationship is with its share registrar, based in the UK, but also engages banking and corporate services, and accounting and legal services, from UK based organisations.

Further information on the Group, its operations and business model can be found in our Annual Report [www.hastingsplc.com/investors/results-centre](http://www.hastingsplc.com/investors/results-centre)

POLICIES IN RELATION TO SLAVERY and HUMAN TRAFFICKING

The Group has a responsibility to conduct its business in an ethical and transparent way. Accordingly, we adhere to a set of business principles which include a commitment to human rights principles. Policies and procedures underpin the Group's overall control and governance structure, as well as supporting our 4Cs culture, including policies covering conduct, whistleblowing, recruitment, anti-bullying and harassment, health and safety, anti-bribery and corruption, diversity and equality, compassionate leave, disciplinary, and religious holidays. These policies are reviewed and updated as appropriate in line with changes to best practice and/or legislation.

The Group has a procurement and supplier performance management policy that supports the Group's procurement and supplier management framework to attract the best suppliers and secure best value from them; to manage risks; and to ensure that the regulatory and legal obligations relating to these are met, including outsourcing and supplier conduct requirements.

The Group's policies and frameworks reflect our commitment to minimise the risk of modern slavery or human trafficking occurring anywhere in our business operations.

DUE DILIGENCE PROCESSES, RISK ASSESSMENT and MANAGEMENT

We include appropriate measures in our due diligence processes to engage suppliers and business partners on a risk assessed basis. As part of the procurement and supplier performance management policy we ensure that all of our suppliers undergo a stringent due diligence process before engagement and continued oversight and performance management during that engagement. Compliance with human rights, fair treatment and reasonable remuneration for colleagues as well as safe working conditions are all reviewed.
As part of the pre-employment and recruitment process for our colleagues, we ensure that all colleagues are legally permitted to work within the UK and that they are joining us of their own freewill and are not coerced to join us. HISL and AICL are both regulated financial services firms, and background and financial checks are undertaken on all of our colleagues. We also require our suppliers to operate in a similar manner dependent on the service they provide to the Group.

**TRAINING**

We raise awareness of conduct, human rights and diversity and inclusion amongst our colleagues through annual mandatory training via an online platform. Completion rates for all mandatory training are monitored and business leaders are informed where these rates are not satisfactory.

We also ensure all of our colleagues are aware of our whistleblowing policy, via a training module, and are advised how to report potential or actual incidents. We encourage colleagues to report all potential or actual incidents that relate to wrongdoing or actual or suspected illegal or serious inappropriate activity, whether related to modern slavery or not. A confidential, externally facilitated portal is provided for colleagues to report their concerns confidentially.

**EFFECTIVENESS**

We monitor for any incidents of actual or suspected illegal or serious inappropriate activity.

During the year ended 31 December 2018 there were no incidents relating to modern slavery or violations of human rights identified and no incidents were reported by colleagues, whether internally via management, or via the whistleblowing portal. There were also no incidents reported relating to our supply chain, either by internal supplier relationship managers or our suppliers themselves.

This statement has been approved by the HGH Board, on behalf of the Group, on 27 February 2019.

*Toby van der Meer*

Toby van der Meer, Chief Executive Officer, on behalf of Hastings Group Holdings plc and its subsidiary entities.