Ardonagh Modern Slavery Act Statement

Introduction

The Modern Slavery Act 2015 (the "Act") is a UK law that came into force in 2015. The Act requires commercial organisations with an annual turnover of more than £36 million to publish a slavery and human trafficking statement for each financial year. As a major provider of insurance broking and associated services, the Ardonagh group of companies (the "Ardonagh Group") is fully supportive of the Act and, as required by the Act, this statement sets out the steps taken during the financial year ended 31 December 2019 to combat slavery and human trafficking in our business and supply chains.

Our business

The Ardonagh Group brings together leading businesses in their respective fields within the insurance broking and services industry. For all or part of 2019, the Ardonagh Group comprised the following businesses: Autonet, Bishopsgate, Carole Nash, Chase Templeton, Geo Underwriting, Health and Protection Solutions, Paymentshield, Price Forbes, Swinton, Towergate and URIS Group. As a group, we provide a wide range of insurance products and services to businesses and consumers, and the legal entities that carry out insurance-related activity are authorised and regulated by the Financial Conduct Authority. As a group we have over 6,000 staff in our nationwide offices and most of our business is within the UK. More information about our business can be found at: http://www.ardonagh.com.

Our supply chains

Our supply chains include business partners in the provision of insurance services such as insurance companies, brokers and distributors; and also providers of other services necessary to run our business effectively, such as IT, payroll, and facilities.

Recruitment practices

We recognise the right of each employee to freedom of association, including the right to join trade unions. We ensure that we comply with employment legislation as regards child employment and we do not employ people who do not have the right to work in the UK.

Due diligence and contracting

The Group Outsourcing and Procurement Policy mandates the requirement for checking compliance. The businesses that make up the Ardonagh Group have varying processes in relation to ensuring that slavery and human trafficking risks are appropriately managed. Within Bishopsgate, Chase Templeton, Geo Underwriting, Paymentshield and Towergate, a question set and declaration called Know Your Supplier (KYS) is required to be completed by the Suppliers. This includes a section on slavery and human trafficking. The KYS has been used for due diligence since the beginning of 2017. In contracting, standard contractual documentation with suppliers requires compliance with the Act and for all Material Suppliers and includes a requirement for an annual attestation confirming compliance. Additional tools such as tiscreport.org are also being used to check statements by some businesses. Price Forbes continues to review its supply chain to verify that its key suppliers are committed to observing best practice when it comes to slavery and human trafficking issues and compliance with the Act and is starting to use the KYS process. Autonet and Carole Nash audited appropriate business partners’ websites to confirm that they had posted modern slavery statements. URIS Group does not fulfil the turnover requirement within the Act but has committed to adopting minimum standards in relation to the Act.
Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, staff involved in purchasing and entering into contractual arrangements on behalf of Bishopsgate, Chase Templeton, Geo Underwriting, Paymentsheild and Towergate have been made aware of the provisions, requirements and importance of the Act. Price Forbes uses online training to ensure that its staff are aware of the Act and the wider issues around slavery and human trafficking.

Further steps

As part of the rollout of our Group Policies and Business Standards it was recognised that there is a need to clearly articulate the minimum standards required to comply with the Modern Slavery Act which require to be adopted and embedded across all businesses within the Ardonagh Group. This was rolled out in early 2019, to ensure a consistent approach going forward.

As part of our annual review a supplier health check will be completed which will include compliance with the Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.


David Ross
Group CEO