



Modern slavery and human trafficking statement

The duty to produce a statement applies to financial years ending on or after 31 March 2017.

Statement wording

Introduction

This statement sets out Sabre's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

As part of the insurance sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement covers the activities of Sabre Insurance Company Limited:

Motor insurance company.

Countries of operation and supply

The organisation currently operates in the following countries:

UK

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

Policies: Wendy Bamping, Head of Human Resources is responsible for putting in place and reviewing policies and the process by which they were developed.

Risk assessments: The company has a responsibility for human rights and modern slavery risk.

Investigations/due diligence: Daisy Thomas, Claims Supply Chain Manager and Wendy Bamping, Head of Human Resources.

Training: when necessary to understand slavery and human trafficking risks.

Relevant policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

Whistleblowing policy: The company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employee code of conduct: The company's code makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier/Procurement code of conduct: The company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Recruitment/Agency workers policy: The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency

Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

We support the protection of human rights through our supply chain by using suppliers whose values are consistent with ours. The claims supply chain is considered low risk operating within a skilled environment.

Performance indicators

The company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the company has selected the relevant KPIs from the list below:

requiring claims supply chain manager and HR professionals to have completed training on modern slavery by August 2016;

developing a system for supply chain verification in place since date, whereby the company evaluates potential suppliers before they enter the supply chain; and

reviewing its existing supply chains completed on date xxx, whereby the company evaluates all existing suppliers.

Training

The company requires claims supply chain manager and HR professionals within the company to complete training on modern slavery as a module within the company's ethics.

The company's modern slavery training covers :

our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged

on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;

how to identify the signs of slavery and human trafficking;

what initial steps should be taken if slavery or human trafficking is suspected;

how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

Awareness-raising programme

As well as training staff, the company has raised awareness of modern slavery issues by circulating emails to staff.

The emails explain to staff :-

the basic principles of the Modern Slavery Act 2015;

how employers can identify and prevent slavery and human trafficking;

what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

what external help is available, for example through the Modern Slavery Helpline.

Board/Member approval

This statement has been approved by the company's board of directors, who will review and update it annually.

Director's signature:



Director's name:

Geoff Carter

Date:

3/10/16.