



# TOPINSURE GROUP MODERN SLAVERY STATEMENT

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 with respect to the financial year ending 30 September 2020 and sets out the steps taken by Topinsure Limited and other relevant group companies<sup>1</sup> during this financial year to prevent slavery and human trafficking within its business or supply chains.**

## Opening Statement

We strive to act ethically and with integrity in all of our business dealings to protect the human rights of workers, both within our business and supply chains and we are committed to improving our practices to combat modern slavery and human trafficking.

## Our Organisation

The Topinsure Group of companies is one of the UK's highest rated and fastest growing technology enterprises, providing software solutions to the insurance industry. Topinsure Limited, Midinsure Limited, Bidinsure Limited and Acturis Group Limited provide management services to its subsidiaries, including Acturis Limited and Acturis Poland Sp. z o.o. Acturis Limited is a software as a service provider primarily to the UK general insurance industry, and Acturis Poland Sp. z o.o. provides software configuration services and customer support services to Acturis Limited. Acturis International Limited is a holding company. At 30 September 2020 Acturis employed over 800 people in Europe and has business operations in five European countries.

Acturis Limited has a global annual turnover in excess of the threshold set out in section 54 of the Modern Slavery Act 2015. To find out more about the nature of our business, please click [here](#).

Our procurement activities take place in England and our suppliers are predominantly UK and EU based. Our supply chains include outsourced software support and development services, hardware providers, data centre providers, recruitment providers, office supplies providers and cleaning suppliers.

We have carried out an initial review of our business and supply chain and consider that there is a low risk of modern slavery and human trafficking occurring within it.

## Policies

Acturis respects the human rights of its employees and is committed to a work environment in which all individuals are treated with respect and dignity. Acturis has a number of HR

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<sup>1</sup> This statement is made on behalf of Topinsure Limited, Midinsure Limited, Bidinsure Limited, Acturis Group Limited, Acturis International Limited and Acturis Limited, which are each required to make a statement in accordance with section 54(1) of the Modern Slavery Act 2015, and Acturis Poland Sp. z o.o., which is part of Acturis Limited's supply chain ("Acturis", "we", "our", the "Group").

policies and internal procedures in place to protect the human rights of its employees, including an anti-bribery policy and a whistle blowing policy.

As part of our commitment to combatting modern slavery, we have implemented an Anti-slavery and human trafficking policy ("Policy") within our organisation, which reflects our commitment to acting ethically and with integrity in our business and business relationships and to implementing appropriate and proportionate systems and controls to ensure slavery and human trafficking is not taking place in our business or supply chains.

We are also taking steps to ensure that our key suppliers are aware of our Policy, and expect them to adhere to the same high standards.

We encourage individuals aware of any potential breach of the Policy to raise any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage, both in our Anti-Slavery Policy and Whistleblowing Policy.

### **Due Diligence**

We have identified the following areas of the business or supply chain that we consider to give rise to the highest susceptibility of modern slavery: (A) Processes where low skilled labour is required or managed including office supplies providers and cleaning suppliers, and (B) processes outsourced outside of the EEA.

In order to mitigate the risk of modern slavery occurring within our supply chains, we take steps to consider the level of modern slavery risk in relation to each key supplier that we procure on a case by case basis based on the nature and value of the product or service being procured, including taking into account country risk, sector risk, business or transaction risk, and product risk.

Our procedures are designed to:

- Establish and assess areas of potential risk in our business and supply chains;
- Monitor potential risk areas in our business and supply chains;
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains;
- Provide adequate protection for whistle blowers.

### **Risk and Compliance**

Acturis regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. Where we have identified a potential risk we will take steps to remediate it through legitimate and proportionate processes.

### **Training**

Acturis has taken steps to implement a training programme to educate staff to recognise the risks of modern slavery and human trafficking in our business and supply chains, both during the employee induction process and at appropriate intervals thereafter. We continue to monitor the need for training based on our assessment of the risk of modern slavery occurring in our supply chain. Through our training programmes, employees will be

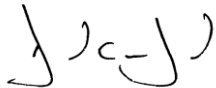
encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy.

### **Further Actions**

Following Acturis's review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Continue to monitor modern slavery risks within our business and supply chain.

Signature:

A handwritten signature in black ink, appearing to read 'David McDonald', written in a cursive style.

David McDonald

Co-CEO – Topinsure Limited

Date: 22 March 2021