

MODERN SLAVERY STATEMENT

INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes our firm policy in respect of slavery and human trafficking.

Group Structure:

Booking Protect Ltd, registered address is Romero House, 8 Airport West, Leeds LS19 7ZA. Registered in England and Wales number 8968744

Our Business:

Insurance Agents & Brokers – Refund Specialist

Our Recruitment Suppliers:

The firm does not operate in an industry where modern slavery is prevalent but nevertheless is committed to taking steps to uncover any potential risks within its supply chain.

We recruit in the main from a register of approved and accredited recruitment agencies, licensed through the professional body of The British Institute of Recruiters. Occasionally we use an internal referral system of recommending known and high calibre potential new staff to the business.

OUR POLICIES

This firm has various policies in place which aim to minimise the risk of modern slavery or human trafficking, and encourage reporting of any related concerns, including:

A Robust Procurement Policy:

with a supplier assessment processes. The firm includes a reference to compliance with modern slavery legislation in its standard terms and conditions and contracting agreements.

Code of Conduct:

Our firm conducts business consistent with the highest ethical and professional standards and will not tolerate behaviour that deviates from those standards. Colleagues are expected to act with integrity, honesty, courage and to promote mutual respect.

Whistleblowing Policy:

Respect and a culture of openness in the workplace is a key aspect of the firm's ethical policy and Code of Conduct. The firm encourages colleagues and other business partners to report any concerns, including any concerns relating to modern slavery or human trafficking.

The firm has a whistleblowing procedure which makes reporting easy and confidential.

We may amend this Policy at any time by amending this page. For this reason, we recommend that you read this statement regularly.

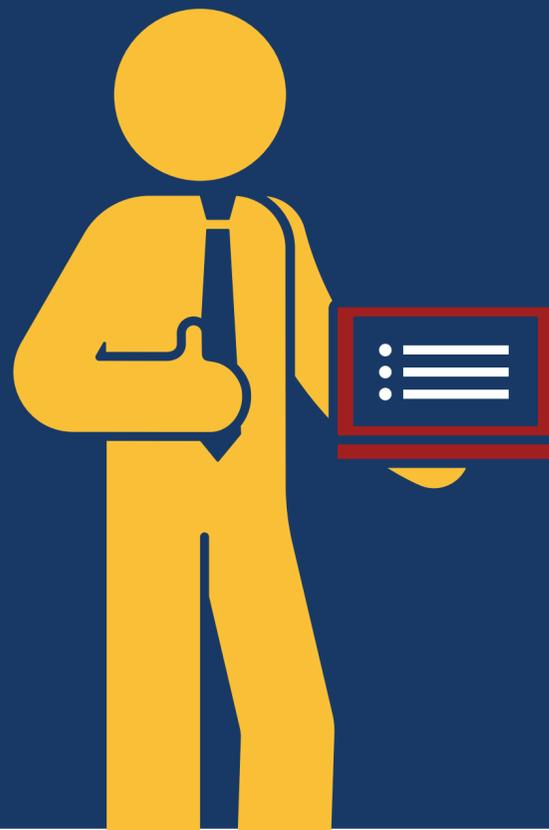
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TRAINING

This Modern Slavery Policy has been rolled out to all staff and incorporated into induction training. It includes information on who staff should contact should they have any concerns.

There is additional training for those staff most likely to interact with supply chains with a potentially higher risk of encountering modern slavery.

Firm staff are encouraged to report any concerns or suspicions regarding the presence of modern slavery within the supply chain.



MODERN SLAVERY POLICY

1. Application and Background

This policy reflects the Firm's obligations under the Modern Slavery Act 2015 and the Firm's commitment more generally to avoid any form of modern slavery or human trafficking within its operations or its supply chain.

2. What is Modern Slavery?

Modern slavery includes:

1. Slavery – the behaviour on the part of the offender as if they owned the victim, depriving the victim of their freedom;
2. Forced or compulsory labour – work or service of a victim which involves coercion, either direct threats or violence or more subtle forms of compulsion. Work or service is extracted from the victim under the menace of any penalty and for which the victim has not offered themselves voluntarily; and
3. Human trafficking – arrangements for the travel of the victim with a view to them being exploited.

It is important to recognise that modern slavery is prevalent throughout the world and whilst less common, exists in the United Kingdom and other developed countries.

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▶ MODERN SLAVERY POLICY cont...

3. Response to Modern Slavery

The Firm will not tolerate any form of modern slavery within its own operations or within its supply chains.

You should notify your line manager or HR business partner as soon as possible if you have any concerns, issues or suspicions about modern slavery in any parts of the business or its supply chains.

4. The processes in relation to the Firm's suppliers are set out below.

The Firm aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Firm is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Firm's business or its supply chains.

5. Modern Slavery and our Supply Chain

The Firm deploys rigorous existing processes to assess and validate its vendors prior to making either a purchase from or a payment to a vendor. These checks are required of all vendors before the vendor can be added to the Firm's systems to allow payment to the vendor.

6. Information and Training

This policy has been distributed and communicated to all UK Firm staff and all staff are expected to read this policy closely.

In addition, the Firm has arranged training for those staff most likely to interact with suppliers with a potentially higher risk of modern slavery.

7. Responsibility for this Policy

The HR department has primary responsibility for monitoring the implementation of this policy, dealing with any queries about it and assessing its effectiveness.