



# Anti-Slavery and Human Trafficking Statement

## 1 Introduction from the Chief Executive Officer

An organisation like Motor Insurers' Bureau (MIB) is more than the sum of what it does. It is also what people know and believe us to be - and that's why our reputation as a good corporate citizen demands that we always act ethically and with integrity.

These values are at the heart of our Anti-Slavery and Human Trafficking Statement.

MIB (a private company limited by guarantee with company number 00412787) and its subsidiary companies (Official Injury Claim Limited, MIB Management Services Limited, MIB Portal Services Limited and Tracing Services Limited) (collectively, the 'MIB Group'), are proud of the steps we have taken to seek to understand all potential modern slavery risks relating to the operation of our business. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business.

This statement describes precisely how we will fulfil this commitment and covers relevant policies, procedures, codes of conduct, risk assessments, due diligence and training provision.

## 2 Organisational structure and its supply chains

MIB was established in 1946 to compensate the victims of uninsured and hit and run (untraced) driving. Today our mission is to:

- Give people the means to get their lives back on track after a motor accident and spearhead innovation to free our roads of uninsured and 'hit & run' drivers.
- Be entrusted to manage services which are secure, easy to access and benefit society.
- Continuously evolve our customer service experience through technological innovation.

To this end, we offer claims services for the victims of uninsured and untraced drivers; provide and maintain insurance databases; and operate a police assistance service. These services are provided through MIB as well as the companies referred to above, and our client companies Claims Portal Limited, Employers' Liability Tracing Office, Medco Registration Solutions and Insurance Fraud Bureau.

MIB Group operates in the UK only and has offices in Milton Keynes and London. We employ just under 320 people from the local and surrounding areas.



To ensure the continuity of our operations, we source professional services within a supply chain that is mostly UK-based with limited subcontracting outside the UK. While we consider our overall supply chain as low risk, we recognise that slavery does exist in the UK and take a vigilant approach regardless of the location of our supply chain.

### 3 Commitment

MIB Group is a principles-driven organisation and we place strong emphasis on our employees displaying the following principles:

- Think Big – empowered to innovate, evolve and continually improve
- Inspire – the work we do and how we do it should inspire those around us
- Customer First – put our customers at the heart of all we do

These are more than just words. We ask and expect our employees to display these principles in the work they do every day. Our principles underpin and reinforce our expectation that no modern slavery or human trafficking occurs in any part of our business or supply chain. They are also embedded through our policies, which are described below.

### 4 Policies and helplines

We have zero tolerance to slavery and human trafficking. The following policies describe our approach to both identifying and mitigating modern slavery risks and outline the steps to be taken to prevent slavery and human trafficking in any part of our business or our supply chain:

#### 4.1 Anti-slavery and human trafficking notification procedure

To prevent slavery and human trafficking in our corporate activities and within our supply chain, we require all employees to read, understand and comply with our Anti-Slavery and Human Trafficking notification procedure, which is explained as part of all employee inductions. The procedure can be found in the staff handbook. It not only defines modern slavery and human trafficking for employees; it indicates potential identifying factors and explains what employees should do if they believe they have encountered an example of modern slavery or human trafficking.

#### 4.2 Whistleblowing policy

At MIB Group, we encourage all employees, customers and other business partners to report any concerns related to danger, fraud, illegal or unethical conduct in the workplace. This includes any form of modern slavery, a point we expressly set out in our policy. Our whistleblowing policy is designed to make it easy for our employees to make disclosures without fear of retaliation. The

policy can be found in the staff handbook and it clearly describes the procedure for reporting and the level of protection that they can expect to receive in return.

If an employee wishes to remain anonymous, they have the option to report their concerns to an independent organisation. This service is free of charge and is available 24/7.

#### 4.3 Conduct policy

MIB Group encourages all employees to act in accordance with our stated core principles and with the highest levels of integrity when carrying out daily activities. Any failure to do so may be treated as an act of serious misconduct, as is clearly stated in the staff handbook and disciplinary procedure.

#### 4.4 Supplier code of conduct

Contractors and others in our supply chain must comply with our principles. To ensure that this happens, we conduct thorough due diligence on all our suppliers. We also ensure that our contracts with suppliers include an obligation on the supplier to comply with the Bribery Act 2010 and the Modern Slavery Act 2015. Whilst we will make efforts to resolve issues of unethical work practices with suppliers, failure to adhere to these standards may ultimately lead to the termination of a contract.

#### 4.5 Employee helpline

MIB Group provides its employees and the family members of employees with two helplines: an Employee Assistance Programme helpline and a Public Concern at Work helpline.

These are widely publicised within the organisation and can be used anonymously to discuss any concerns that are personal or work related. The goal is simple: to ensure that our employees have a confidential forum that offers help and advice when they need it most.

#### 4.6 Modern slavery risk assessment

As part of the motor insurance industry, MIB Group recognises that it has a responsibility to take a robust approach to the possibilities of slavery and human trafficking.

Given the nature of our operations, we believe that the main risks relating to modern slavery are to be found in our supply chain. We therefore rank and assess our risk by rigorously reviewing the subcontracting activities that our suppliers - both in the UK and outside - may undertake themselves.

We identify risk of modern slavery within our supply chain on our risk register which is reviewed and considered by the Executive Committee. An appropriate assessment of that risk using the

corporate risk management approach ensures that we continue to appropriately monitor and review the risk and any associated actions.

#### 4.7 Supplier/Procurement due diligence

At MIB Group, we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Serious violations of our supplier code of conduct will lead to the termination of the business relationship. In order to identify and mitigate potential modern slavery risks, we take the following approach to our supplier due diligence on an ongoing basis:

- Stipulate our expectations in our pre-qualification questionnaire (PQQ) and the level of information to be supplied in a candidate's response.
- Carry out a verification of suppliers' compliance.
- Ensure that our current contract templates include a warranty from the supplier, that all services provided shall conform in all respects with relevant laws, enactments and regulations, MIB's conduct requirements, the relevant specification or any associated specification, the service levels and the policies of MIB notified to the supplier from time to time (including but not limited to MIB security standards, media, environmental, employee vetting, data handling, security, business continuity and the relevant policies).

### 5 Monitoring our effectiveness at preventing Modern Slavery

As you would expect, our vigilance goes hand in hand with robust monitoring and a commitment to continuous improvement. Our supplier management processes include reviewing the adequacy of our suppliers' anti-slavery statements and the controls that they have in place to ensure compliance with the legislation. Our internal processes of auditing our suppliers produces reports that detail the level of compliance and focus on forced labour, slavery, child labour, bribery as well as other aspects of modern slavery and human trafficking.

### 6 Training

Modern slavery and human trafficking are complex and multi-faceted crimes, and combatting them requires knowledge, awareness and specialist training. For this reason, employees working in our Procurement, HR and Audit teams, as well as our Senior Leadership Team have undergone mandatory training to identify and understand the risks of modern slavery and human trafficking in our supply chains and business. When employees join these teams, they are required to attend



training as part of their onboarding and all employees working in these business areas are required to undergo refresher training every two years.

In addition, the modern slavery and human trafficking notification procedure provides other employees with guidelines on how to spot the signs of modern slavery and human trafficking and how to deal with it if they do.

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes MIB Group's slavery and human trafficking statement for the financial year ending December 2020. The [2020 Anti-slavery statement](#) can be found on our website.

This statement was approved by the Executive Committee of MIB.

A handwritten signature in black ink, appearing to read 'D. Clayden', is positioned above the printed name.

Dominic Clayden  
Chief Executive Officer  
January 2022