



MIB Anti-Slavery and Human Trafficking Statement – 2018

1 Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps the Motor Insurers' Bureau (MIB) (a private company limited by guarantee with company number 00412787) and its subsidiary companies (MIB Management Services Limited, Claims Portal Limited, the Employers' Liability Tracing Office and the Insurance Fraud Bureau) takes in order to understand all potential modern slavery risks related to the operation of the business and how it aims to ensure that there is no slavery or human trafficking within its own business and supply chains. This statement relates to the financial year ending December 2017. The statement for the year ending December 2016 can be found [here](#).

2 Organisational structure and its supply chains

The Motor Insurers' Bureau was established in 1946 to compensate the victims of negligent uninsured and hit and run (untraced) driving. Today our mission is to:

- Significantly reduce the levels and impact of uninsured and untraced driving in the UK
- Compensate victims of uninsured and untraced drivers fairly and promptly
- Provide first-class outsourced services for cross-industry data asset management

We serve our mission with the provision of claims services for the victims of negligent uninsured and untraced drivers, through the provision and maintenance of insurance databases and our police assistance service. MIB has offices in Milton Keynes and London and employs over 550 members of staff from the local and surrounding areas.

MIB sources professional services to ensure the continuity of its operations. The majority of this supply chain is UK based with limited subcontracting to outside the UK. 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 places high emphasis on its employees displaying clear values in line with our brand.

- We conduct ourselves in accordance with the highest ethical principles
- We put our customers first
- We make a difference together
- We take pride in what we do

- We respect each other
- We are compliant with all relevant law and regulations

We expect all of our employees to display these values in the work that they do on a daily basis. Our values filter through to an expectation that modern slavery and human trafficking does not occur in any part of our business or supply chain. We ensure these values are embedded through our policies which are described below.

4 Policies and helplines

MIB 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:

4.1 Anti-slavery and human trafficking notification procedure

MIB is committed to preventing slavery and human trafficking in its corporate activities and within its supply chain. As such all employees must ensure that they read, understand and comply with our Anti-Slavery and Human Trafficking Notification procedure. The policy can be found in the staff handbook and it defines modern slavery and human trafficking for employees as well as potential identifying factors. It also stipulates what employees should do if they believe they have encountered an example of modern slavery or human trafficking.

4.2 Whistleblowing policy

MIB encourages all staff, customers and other business partners to report any concerns related to danger, fraud, illegal or unethical conduct in the workplace. Any form of modern slavery would be included in this description and MIB will take steps to ensure this is made clearer within its policy document in the future. MIB's 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.

4.3 Conduct policy

MIB encourages all staff to act in accordance with the aforementioned core values and with integrity when carrying out daily activities. This is clearly stated in the Staff handbook.

4.4 Supplier code of conduct

Our suppliers are required to sign in acceptance of our Supplier Services Agreement which sets out the standards that are expected of them. This includes our expectations around modern slavery and human trafficking. Whilst we will make efforts to resolve issues of unethical work practices

with suppliers, ultimately failure to adhere to these standards may lead to the termination of a contract.

4.5 Employee helpline

MIB provides its employees and their family members with both 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 which are personal or work related. We hope that by providing these helplines, our employees have a confidential forum to seek help and advice when they need it most.

4.6 Modern slavery risk assessment

As part of the motor insurance industry, MIB recognises that it has a responsibility to take a robust approach to the possibilities of slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking in its corporate activities and within its supply chain.

Due to the nature of our operations we recognise that our main risk with regards to Modern Slavery is considered to be our supply chain. The majority of our suppliers are also based in the UK. As a result, we rank and assess our risk in relation to this by placing greater focus on the high risk subcontracting our suppliers may undertake themselves.

The risk of Modern Slavery within our supply chain is identified on our risk register. 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

MIB 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, 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
- We have carried out a verification of suppliers' compliance during 2017
- Our contract templates have been updated for new procurements. Such contracts (as relevant) include the following warranty obligation on the supplier

“the Services supplied under this agreement shall be to MIB’s satisfaction and 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, staff vetting, data handling, security, business continuity and the relevant policies);”

4.8 Monitoring our effectiveness at preventing Modern Slavery

We have updated our internal auditing processes and this now includes the reviewing of 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 which 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.

5 Training

Staff working in Procurement, HR, Audit, as well as our Senior Leadership Team have gone through appropriate mandatory training to identify where our expectations may be at risk of being breached. New joiners to these teams will be issued with training as part of their onboarding and all staff working in these business areas will be required to undergo refresher training every two years.

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

This statement was approved by the Executive Committee of MIB.

A handwritten signature in black ink, appearing to read 'D. Clayden', with a long horizontal flourish extending to the right.

Dominic Clayden
Chief Executive Officer
29 June 2018