

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction**

At Acromas Insurance Company Limited (“AICL”), we are committed to carrying on our business operations responsibly and to acting ethically and with integrity in all business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking do not take place in our own business or in any of our supply chains.

### **About AICL**

AICL is an insurance company authorised pursuant to the laws of Gibraltar to effect and carry out contracts of insurance which are sold to customers through Saga Services Ltd and AA Insurance Services. AICL underwrites products to include motor, home, pet and breakdown.

AICL employs over 40 people who are largely based in Folkestone Kent.

As a business we buy a wide range of things, from claims management services, claims services suppliers (including vehicle repair, hire car, legal, claims investigation, loss adjusting and surveying), audit and consultancy services, reinsurance and IT systems. Some of these things we use in our own business and others we use as part of the services we provide to our customers.

As a member of the Saga Group, AICL complies with, and is subject to, all policies and processes that Saga plc has in place. AICL’s employees have to complete the same mandatory training as Saga employees. In addition, AICL is included within Saga’s wider audit and compliance activity to ensure we comply with both the law and Saga’s internal governance.

### **Modern Slavery Act 2015**

As a result of the above, our statement includes the statement by Saga plc, which is set out in the appendix below. This describes the steps that AICL and Saga plc have taken to prevent acts of modern slavery and human trafficking occurring in our own businesses and in any of our supply chains.

Our statement covers 01 February 2017 to 31 January 2018.



**Andrew Button**

CEO

July 2018

# Modern Slavery Statement – July 2018

## 1. Introduction

This statement is made on behalf of Saga plc (a public limited company listed on the London Stock Exchange, registered in England and Wales, with registered number 8804263) and its subsidiaries, as listed in Appendix 1, (together, “we”, “us”, “our”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”).

The UK Modern Slavery Act 2015 requires companies to explain on an annual basis the steps taken to prevent acts of modern slavery and human trafficking occurring in their businesses and supply chains. This statement sets out the steps we have taken during the financial year ending 31 January 2018, and builds upon the positive steps we took last year.

## 2. Risk Assessment - Update

Last year we identified our holidays and cruises operations as carrying a potentially higher modern slavery risk due to the vast number of locations in which we procure goods and services. As such, this year we have successfully implemented a risk assessment process in respect of our current suppliers, resulting in the identification of potential high-risk suppliers. We have adopted a similar risk assessment process for the onboarding of new suppliers too, and it is this process that informs whether or not a supplier is subject to further assessment via our due diligence questionnaire.

## 3. Due Diligence - Update

Our due diligence questionnaire, which was developed last year, has now been successfully incorporated into the processes and procedures of our holidays and cruises operations via our Customer Health and Safety department. The due diligence questionnaire was distributed to a random sample of potential high-risk suppliers in order to assess the smoothness and efficiency of the automated process, and the level of engagement of our suppliers – all of which was deemed a success. This was achieved prior to our deadline of 31 January 2018.

Following feedback from a pilot study, we are currently making minor amendments to the due diligence questionnaire process, with the intention of rolling this out to all potential high-risk suppliers over the course of 2018.

We remain committed to working with our suppliers to ensure business is conducted ethically and honestly. Therefore, should a supplier fail our due diligence questionnaire, we will work with

them to implement a corrective action plan to rectify areas of non-compliance. Should a supplier continually disregard our proposed plan, or demonstrate little progress despite realistic time frames being agreed and set, we will consider our future relationship with that supplier.

We continue to strongly encourage hotel suppliers to apply for membership with the independent sustainability audit programme, 'Travelife', and also to continue to work towards obtaining Gold certification which demonstrates compliance with international standards on human rights.

#### 4. Policies & Training

Both our Anti-Slavery & Anti-Human Trafficking Policy and our Whistleblowing Policy are communicated throughout our organisation regularly, and are used as the basis for our employees to be able to detect and prevent acts of modern slavery. These policies are also now part of our corporate induction process for new employees.

In addition, we have created and distributed training material for delivery to all employees through our e-learning platform to ensure a consistent, high level of awareness and understanding is achieved. By 31 January 2019, we aim for all employees to have completed this training.

#### 5. Summary

We now have systems in place to:

- Identify and assess potential risk areas within our businesses and supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Train employees to raise awareness of modern slavery and how to report it
- Protect whistle-blowers

We will continually review and refine these processes to strive to operate to the highest standards at all times.

This statement covers 01 February 2017 to 31 January 2018 and has been approved by the Board of Saga plc.



**Lance Batchelor**  
Chief Executive Officer

July 2018

## Appendix 1 – Subsidiaries\*

1. Saga plc
2. Saga Mid-Co Limited
3. Saga Holdings Limited
4. Saga 200 Limited
5. Saga 400 Limited
6. Acromas Insurance Company Limited
7. Saga Properties Limited
8. Saga Leisure Limited
9. CHMC Holdings Limited
10. CHMC Limited
11. Saga Group Limited
12. Saga Publishing Limited
13. Metromail Limited
14. Saga Personal Finance Limited
15. Saga Investment Services Limited
16. Saga Services Limited
17. Saga Healthcare Limited
18. Saga Retirement Villages Limited
19. PEC Services Limited
20. Saga Membership Limited
21. ST&H Group Limited
22. ST&H Limited
23. Driveline Group Limited
24. ST&H Transport Limited
25. Titan Transport Limited
26. Titan Travel Holdings Limited
27. Destinology Limited
28. Saga Cruises Limited
29. Enbrook Cruises Limited
30. Saga Cruises IV Limited
31. Saga Cruises V Limited
32. Saga Cruises VI Limited
33. Saga Cruises GmbH

\* Please note the above list does not include dormant companies.