

ACROMAS

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 intermediaries within the Saga Group, the AA plc group and the RAC. AICL underwrites products to include motor, home and the related add-on products, pet, caravan and breakdown.

AICL employs over 60 people who are largely based in Folkestone, Kent or remote working.


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 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 1 February 2023 to 31 January 2024.

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Simon Douglas

Chief Executive Officer of AICL

July 2024

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT – JULY 2024

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 Act requires companies to explain on an annual basis the steps taken to prevent acts of modern slavery and human trafficking from occurring in their businesses and supply chains. This statement includes the steps we have taken during the financial year ending 31 January 2024.

We are committed to carrying on our business operations responsibly with a zero-tolerance approach to any slavery and human trafficking incidents which are proven to have taken place. We remain committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking do not take place in our own business or in our supply chains.

2. About the Saga Group

We provide products and services predominately tailored to customers over the age of 50 in the UK. Such products and services include insurance, cruises and package holidays, personal finance and the Saga Magazine. Central to the success of each of these operations are our 3,884 employees, all of whom strive to deliver exceptional experiences to our customers every day. Our ‘Saga’ brand has been developed over the years to become a recognised and trusted brand among UK consumers aged over 50.

The varied nature of our products and services means we purchase a wide variety of goods and services from suppliers within the UK and internationally. Therefore, our supply chain is large and complex, with each supplier often having its own supply chain.

3. Risk Assessments

The Saga Group continues to operate a risk assessment process for new suppliers to assess any modern slavery risk which has been embedded into our Procurement & Supplier Management onboarding process. Saga has also developed a Supplier Code of Conduct which sets out the types of behaviours the Saga Group expects of all suppliers including respect for all human rights, compliance with all relevant human rights regulations, and the creation of a working environment that is compliant, safe, and fair.

In respect of existing suppliers, we previously implemented a risk assessment process in respect of all existing suppliers across the Saga Group in 2016. As part of our ongoing monitoring of our modern slavery risk, in 2019 we re-examined our existing suppliers across the Saga Group to assess the potential for any residual modern slavery risk.

In 2022, we began the process of re-examining our existing suppliers as part of our ongoing monitoring of modern slavery risk in our supply chains which, due to organisational changes within the Group, was completed in 2023. The process of re-examining our existing suppliers will then be undertaken again in 2025

in line with our policy of carrying out follow-up risk assessments on existing suppliers every three years. We are also currently reviewing our risk assessment processes to ensure they remain effective.

4. Due Diligence Questionnaires

Any suppliers identified as high risk (following the risk assessment process outlined above) are subject to further due diligence procedures, including the completion of a due diligence questionnaire designed to further assess the level of risk and the steps required to monitor and manage that risk.

In respect of our holidays and cruise suppliers identified as high-risk, our due diligence questionnaire is distributed by the relevant business for completion by the relevant suppliers. The business sets realistic timeframes for suppliers to respond with a limited number of reminders if a response has not been forthcoming. Our non-holidays and cruise related operations (principally in the financial services sector) have been identified as lower risk; however, should further due diligence be required, procedures are also in place to put these suppliers through our due diligence processes including providing them with a similar due diligence questionnaire.

We remain committed to working with our suppliers to ensure business is conducted ethically and honestly. In particular, in respect of those holidays and cruise suppliers identified as high-risk from a modern slavery perspective, the relevant Travel business work with those suppliers who have failed our due diligence questionnaire. This has involved first checking that suppliers have understood the questions and answered them correctly followed by, if required, working with them to implement corrective action plans to rectify areas of non-compliance. This remains an ongoing process. Should a supplier fail to co-operate with our due diligence procedures and/or any corrective action plan or otherwise demonstrate little progress despite realistic time frames being agreed and set, we have and will consider our future relationship with that supplier.

5. Policies & Training

We are committed to working responsibly and with integrity, as set out in our Personal Standards & Ethics Policy. We require the highest standards of personal and professional honesty and integrity from our employees in all business dealings and relationships, including with our customers, other employees and suppliers.

The prevention, detection and reporting of slavery and human trafficking in any part of our business or supply chains is the responsibility of all those working for us. Our Speak Up Policy ensures all employees are able to confidentially and anonymously raise concerns and report suspected violations via our Confidential Speak Up Service which can be accessed online and by phone.

The Speak Up Policy is communicated to employees as part of the corporate induction process and, in addition, it is available for our colleagues to access at any time on our intranet 'Workplace'.

Our Anti-Slavery and Anti-Human Trafficking Policy is also communicated regularly throughout our organisation. It is reviewed annually and also requires approval from the Saga plc Board every three years in line with Saga's corporate governance procedures save that any material changes to the Policy before then must be pre-approved by the Saga plc Board.

Our policies are used as the basis for our employees to be able to detect and prevent acts of modern slavery. These policies are available for our colleagues to access at any time through our intranet 'Workplace'.

In line with our Anti-Slavery and Anti-Human Trafficking Policy, it is a requirement that all new agreements with suppliers must be in writing and contractually oblige the supplier to comply with the Act. Where possible, it is a requirement that each agreement shall give the relevant Saga Group company concerned a right of termination in the event that the contractor or supplier is proven to have committed slavery or human trafficking offences or to have acted in a manner inconsistent with the Act. We have, therefore, developed and

implemented into our template agreements, specific contractual clauses covering these points. These are reviewed and enhanced where it is felt necessary.

We have continued to distribute training material to employees through our e-learning platform to ensure a consistent, high level of awareness and understanding of modern slavery is achieved. This is reviewed and will continue to be rolled out to employees on an annual basis.

6. Auditing & Ongoing Compliance

Our Internal Audit procedures incorporate an assessment of our modern slavery processes within relevant audits and in 2023 we uploaded our statement to the Government Modern Slavery Statement Registry to share the steps we are taking to prevent modern slavery in our supply chains.

We remain committed to preventing slavery and human trafficking. In 2023, we reviewed our processes, with a primary focus on our Travel businesses, to ensure they continue to be effective. We will also seek opportunities for further improvements in assessing and developing our approach to modern slavery. As our processes evolve, we aim to identify and monitor appropriate performance indicators.

7. Summary

We 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; and
- Protect whistleblowers.

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

This statement covers 01 February 2023 to 31 January 2024 and has been approved by the Board of Saga plc.



Mike Hazell
Group Chief Executive Officer

July 2024

APPENDIX 1 – SUBSIDIARIES*

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| 1. Saga plc | |
| 2. Acromas Insurance Company Limited | <u>Travel and Shipping Companies:</u> |
| 3. CHMC Limited | 13. Saffron Maritime Limited (Guernsey) |
| 4. CustomerKNECT Limited | 14. Saga Crewing Services Limited |
| 5. PEC Services Limited | 15. Saga Cruises Limited |
| 6. Saga Group Limited | 16. Saga Cruises V Limited |
| 7. Saga Membership Limited | 17. Saga Cruises VI Limited |
| 8. Saga Mid Co Limited | 18. Saga Travel Group (UK) Limited |
| 9. Saga Personal Finance Limited | 19. ST&H Limited |
| 10. Saga Publishing Limited | 20. Titan Transport Limited |
| 11. Saga Services Limited | |
| 12. The Big Window Consulting Limited
(company left the Saga Group on 31
December 2023) | |

* Please note the above list does not include dormant and non-trading companies