



Modern Slavery and Human Trafficking Statement

FOR FINANCIAL YEAR ENDING DECEMBER 2022

At Simply Business, we're passionate about building a brighter, fairer society. And when it comes to doing our part, we're serious about our commitments.

Whether it's giving back to the community through our nonprofit partnerships, ensuring inclusion and caring for the planet through our Social Impact strategy, or advancing diversity, equity and inclusion in the workplace, we believe it's our responsibility to champion equality, and create something better.

Since 2017, Simply Business has been an accredited B Corp. This accreditation recognises our strong track record of, and commitment to, having a positive impact on people, society and the environment. That's why we're committed to complying with the Modern Slavery Act.

What is the Modern Slavery Act 2015?

The Modern Slavery Act 2015 (the “**Act**”) seeks to address the role of businesses in preventing modern slavery occurring in their organisations and supply chains. It applies to businesses of a certain size, which are required to publish a statement setting out the steps they have taken to ensure that modern slavery and human trafficking are not taking place in their business or supply chains.

This statement sets out the steps that we have and will continue to take as part of our ongoing commitment to keep slavery and human trafficking out of our business and our supply chains.

Simply Business

Xbridge Limited, trading as ‘Simply Business’, is the UK’s leading provider of SME and landlord insurance. We are a private limited company (part of the Travelers Companies, Inc group) operating in the UK and have an affiliate company, Simply Business Inc., operating in the USA. We help small businesses obtain the tailored business and landlord insurance they need, with the aim of protecting their businesses or rentals as simply as possible.

Our suppliers are businesses who support our core function and wider operations as an insurance intermediary by providing us with a wide range of services and products (such as software and claims handling services), in addition to the insurers who provide the insurance products and underwriting capacity required to service our customers’ requirements.

We believe the nature of our business as an insurance intermediary means we are not directly exposed to a high risk of modern slavery and human trafficking. However, the risk of modern slavery and human trafficking may not always be obvious, and it remains an important and ongoing risk for all businesses and organisations. We are, therefore, committed to acting ethically and with integrity in all of our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

Our Practices and Policies

We want our suppliers and contractors to support our zero-tolerance approach to modern slavery, and we’ve taken the following steps to further this goal:

- Set up ongoing processes to review our supply chains and carry out risk-based assessments of our suppliers

- Reviewed the Modern Slavery and Human Trafficking Statements published by our key suppliers
- Sourced our goods and services in accordance with our Procurement Policy. This sets out guidelines in respect of acceptable safety, environmental, social and local legal standards under which products and services are made and provided and is available to all Simply Business employees
- Where possible, included provisions within our contracts with suppliers that require them to comply with the law, including applicable anti-slavery and related laws including the Act

Our employees are our biggest asset; we value them highly and have received [recognition](#) for doing so. That's why it's important to us that our internal practices and policies foster an environment where our employees' wellbeing is central, and assist our employees to identify and report any ethical issues related to modern slavery or otherwise. To support this goal, we've taken the following steps:

- Made this statement publicly available on our internal intranet and our public website so that it can be accessed at any time by our employees and customers
- Reviewed our internal policies to address modern slavery issues
- Required all our employees to comply with Travelers' Code of Business Conduct and Ethics (the "**Travelers Code**"), which reflects our commitment, alongside that of the rest of the Travelers' group, to conduct business with honesty, integrity, and accountability
- Provided Simply Business employees with access to our Whistleblowing Policy and Equal Opportunities Policy, as well as the Travelers Code. These documents encourage employees to report concerns about any conduct they believe to be unlawful, fraudulent or unethical, and confirm that employees will be protected from any detriment arising as a result. The Travelers Code also provides employees with details of The Ethics Helpline (administered by an independent third party provider), which can be used to disclose ethical concerns
- Implemented a Reasonable Adjustments Policy and a Mental Health Policy to support the wellbeing of our employees and to promote a fair and open working environment in which unethical working practices will not be tolerated
- Provided free access to counselling and therapy to all of our employees
- Made available 'Mental Health Awareness Training' to all of our employees
- Trained 'Mental Health First Aiders' and 'Mental Health Champions' across all of our UK business functions
- Continuously monitored and assessed our business culture and operations to ensure they meet the standards set by our regulator, the Financial Conduct Authority

We will regularly review our internal practices and our supply chain to ensure that our zero tolerance policy in respect of human trafficking and modern slavery is being upheld.

During the next financial year, we aim to identify, assess and manage risks on an ongoing basis by gathering information from suppliers during the procurement and audit processes regarding their awareness of, and compliance with, the Act, and endeavour to ensure that appropriate contractual provisions are built into our supplier contracts.

Our UK General Counsel, who reports to the UK CEO, is responsible for overseeing the implementation of policies and procedures relating to our annual Modern Slavery and Human Trafficking Statement.

This statement is made pursuant to section 54(1) of the Act and constitutes our Slavery and Human Trafficking Statement for the financial year ending 31 December 2022. This statement was approved by Simply Business' Board of Directors on 3rd October 2023.



David Kelly

Chairman, Xbridge Limited (trading as 'Simply Business')



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