

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending September 2018 and has been approved by the Board of Axios Bidco Limited ("Innovation Group")

Introduction

The Innovation Group Limited and its group companies, including those UK subsidiaries listed in the Annex to this statement (the "Company", "Group", "we", "us", "our") are committed to ensuring that our business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited. The Company is committed to preventing slavery and human trafficking in its corporate activities and ensuring that its supply chains are free from all forms of modern slavery.

Organisation Structure

Innovation Group is a global provider of business process services and software solutions to the insurance, fleet, automotive and property industries, with over 3000 employees in entities across the world with an annual group turnover in excess of £285 million for the period to 30 September 2018.

Training

We have created training on modern slavery for our employees to raise awareness of modern slavery and to encourage any employees who do identify potential modern slavery issues within our business or supply chain to report their concerns including via our whistle blowing policy.

Policies

The Company encourages all its workers, customers and other business partners to report any concerns related to the supply chains or any direct activities of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistle blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Supply Chain

Whilst the Company exercises a vital role in our outsourcing services and software solutions distribution chain, it does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour. As a general rule, contractors and suppliers used by the Group are therefore not likely to be susceptible to this risk. However, we understand that others may not always uphold the same standards. Consequently, Innovation Group has procedures in place to ensure that there is oversight over the selection and management of all third party suppliers. These procedures cover due diligence, contractual requirements and ongoing relationship management. In addition, employees responsible for managing suppliers and others involved with the Group are, themselves, responsible for ensuring that our values are upheld. For example, serious violations by suppliers will lead to the termination of the business relationship.

Recruitment and Selection

The Company uses only specified, reputable employment agencies to source labour. All entities in the Group ensure appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

The Company and its associated subsidiaries do not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience,

but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all workers to enjoy, include:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

Next steps

Innovation Group fully accepts we have a responsibility to ensure that human trafficking and all other forms of modern slavery is given proper consideration at the highest level. We shall ensure that adequate and effective arrangements along with appropriate resources are provided to meet the objectives of the modern slavery policy. The Board shall nominate one member to be Human Slavery Director in accordance with best practice and current guidance from the Government.

Responsibility for the success of this policy

The Board of Directors of The Innovation Group Limited (the “Board”) has overall responsibility for our Modern Slavery policy, and for reviewing the effectiveness of actions taken in response to any breaches raised under this policy.

The Board shall review the Modern Slavery policy from a legal and operational perspective at least once a year.

This Statement was approved by the Board of The Innovation Group Limited.

Signed



Alasdair Marnoch
Director, Axios Bidco Limited

Annex to Modern Slavery Statement

Axios Bidco Limited, UK subsidiary companies:

- The Innovation Group Limited
- The Innovation Group (EMEA) Limited
- Motorcare Services Limited
- Innovation Property (UK) Limited
- EMaC Limited
- Innovation Fleet Services Limited
- Innovation Group Business Services Limited