

Modern Slavery Statement

Date: June 2022

Version: v 4.1

Revision history

Version	Status	Date	By	Summary
v 3.0	SUPERSEDED	09 September 2020	Group Legal	In line with MSPolicy, review and update by Board, updated branding
V 4.0	SUPERSEDED	24 June 2021	Group Legal	Annual review and update
V 4.1	CURRENT	13 June 2022	Group Legal	Annual review and update

Sign-off

Version	Date	By	Title	Signature
v 3.0	09 September 2020	Alasdair Marnoch on behalf of Board	Group CFO	
V 4.1	30 June 2022	Alasdair Marnoch on behalf of Board	Group CFO	

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1. Statement

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 December 2021 and has been approved by the Board of Innovation Group Holdings Limited ("Innovation Group")

Introduction

Innovation Group 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 2200 employees in entities across the world with an annual group turnover in excess of £180 million for the period to 31 December 2021.

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. In May 2021, we updated our UK compliance training modules, which are taken during the on-boarding process and then refreshed annually by every member of our workforce in the UK.

Policies

Expectations of how members of our workforce should engage with each other, our customers, our suppliers and the wider community are set out in our Code of Business Conduct. 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 to help drive improvements in working conditions across the supply chains. These procedures cover due diligence, contractual requirements and ongoing relationship management. We continue to identify and respond to new and emerging risks associated with supplier insolvency and increased costs and potential delays in sourcing materials and parts, all of which continues to be challenging in 2022. Our strong relationships with suppliers have been key to identifying and managing these risks and ensuring that there has been no resulting increased risk of modern slavery issues. In addition, employees responsible for managing suppliers and others involved with the Group are, themselves, responsible for ensuring that our values are upheld. 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.

Responsibility for the success of this policy:

The Board of Directors of Innovation Group Holdings 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 Innovation Group Holdings Limited.

Signed



Alasdair Marnoch
Director, Innovation Group Holdings Limited

2. Annex to Modern Slavery Statement

Innovation Group Holdings Limited, UK subsidiary companies:

- Axios Bidco Limited
- 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
- Dimo Computing Limited
- 1Insurer Limited
- 1Insurer Holdings Limited
- The Warwick Partnership Limited
- Warwick Claims Limited
- Warwick Consulting Loss Adjusters Limited