

**Kindertons Group
Modern Slavery and
Human Trafficking Statement**

Modern Slavery and Human Trafficking Statement v1.1 March 2026

Document Control

Date	Version	Summary of Changes
	v0.1	Initial Draft
28/06/25	v1.0	Approved version
28/05//26	v1.1	Review, text and branding updates

Approvals: This document requires approval from

Name	Title	Date of Approval
Tim Broomhall	Head of HR	01/03/2026
Christophe Leemanyan	Managing Director	27/05/2026

Distribution: This document will be distributed via our internal intranet and website.

Frequency of review required: 1 year, and on an ad hoc basis.

This policy will be reviewed (whichever is earliest):

- In-line with the review period
- Where significant change is required
- Due to professional or government body requirements
- Due to legislative changes / amendments

Notification of changes, relevant information and training will be provided where required.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain, by our business partners or in any part of our business. We take a zero-tolerance approach to any suspected or actual violations.

The Group will not support or deal with any business knowingly involved in slavery or human trafficking.

The Group directors and senior management shall take responsibility for implementing this statement and its objectives and shall provide adequate resources and investment to ensure slavery and human trafficking is not taking place within the Group or within our supply chain.

SCOPE, BUSINESS STRUCTURE AND SUPPLY CHAIN

This statement is applicable to all businesses within the Kindertons Group. The businesses covered by this statement are:

Kindertons Investments Limited,
Kindertons Topco Limited,
J P Morriss Assessors Limited,
Kindertons Limited,
Sovereign Automotive Limited.

This statement applies to all 'workers' – be that employees, directors, contractors, consultants, home workers, officers, casual workers and agency workers.

The Kindertons Group provides a wide range of services, including claims investigation, accident management and case management. We currently employ 1600+ staff across the UK.

The nature of work undertaken by our supply chain varies throughout the Group. The services provided by our suppliers include (but are not limited to) claims investigation, case management, surveillance and vehicle hire, repair & inspection.

POLICIES ON MODERN SLAVERY, GOVERNANCE & TRAINING

We as a Group recognise that we all have a responsibility to mitigate and be alert to the risks of slavery, servitude and forced or compulsory labour within our businesses and within our supply chain. As a result, our internal documents hold the following controls to reflect our commitment to acting with integrity and to ensure that any potential risks in relation to modern slavery are identified:

- **Recruitment Policy:**

Our policy stipulates that proof of right to work in the UK must be sought at the interview. All offers of employment are conditional and are subject to the outcome of the pre-employment screening process. We reserve the right to withdraw any pending offer of employment in the event of an unsatisfactory outcome.

- **Equality, Diversity & Inclusion Policy:**

Our policy has been implemented to ensure the fair treatment of all individuals. All persons working for the business have the right to be treated with dignity and respect. All those who act on the Group's behalf will be informed of this policy and will be expected to adhere to it when conducting business on the Group's behalf. Staff receive annual training on our policy.

- **Pay Policy:**

As an employer, we aim to pay fairly and competitively. We will pay at least national minimum wage to all our employees.

- **Code of Business Ethics:**

The Code applies across the Group and to all our employees & business partners (including but not limited to customers, suppliers and contractors). All to whom the Code applies are required as a minimum standard to comply with all laws and regulations, including the Modern Slavery Act 2015. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain. We expect and encourage employees and business partners to bring promptly to management's attention any suspected or actual breaches of our Code. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain. The Group's Code makes clear to employees the actions and behaviours expected of them when representing the organisation. Disregard or breach (actual or suspected) of the Code by an employee may result in disciplinary action. The Group reserves the right to hold business partners responsible should practices occur in their businesses which are not in line with the principles as embodied in the Code. Disregard or breach (actual or suspected) of the Code by a business partner may result in termination of contract. Training on this policy is provided to staff periodically.

- **Whistleblowing Policy:**

This policy ensures all our employees know that they can raise concerns about how colleagues are being treated or about practices within our business or supply chain without fear of detriment. Staff receive annual training on our Whistleblowing Procedure.

SUPPLIER ON-BOARDING AND MANAGEMENT FRAMEWORK: DUE DILIGENCE PROCESSES

Throughout the Group businesses, our contractual agreements provide our suppliers with obligations to adhere to the Modern Slavery Act 2015 and with many of our suppliers, we reserve the right to audit.

As indicated above, as part of the Group Supplier Management Process, due diligence undertaken of suppliers will incorporate a review of the controls undertaken by the supplier surrounding human trafficking, slavery and servitude. Those initial diligence questions should the Group deem there may be a risk, further specific questions may be asked including (but is not limited to) questions on pay, employment practices and contracts.

In 2023, the Group continued diligence around Modern Slavery on our new suppliers, with further diligence scheduled for 2024.

RISK ASSESSMENT

Based upon the services we provide; we have deemed that the risk of slavery within our business is low. As outlined above, the Group have a number of policies which enable us to mitigate to risk of slavery within our business, and the Group shall continue to ensure that the risk remains minimal.

With our suppliers, a great deal are deemed to be low risk as they provide services within low risk sectors and are based in the UK. However, the Group intend to undertake a risk assessment of our suppliers, based upon factors such as their employment practices, location, industry sector and our reliance on this supplier as a business, as our supplier management framework matures. We intend that all suppliers will be categorised and set against the above criteria.

The Group recognises that imported goods from sources outside of the UK and EU are potentially more susceptible to slavery & human trafficking risks. The level of management control required for these sources is monitored.

The Group will continually review the risk of slavery within our business and supply chain and make any necessary changes to our practices if required.

MONITORING

Risks and incidents relating to Modern Slavery are monitored by exception through existing controls within the Whistleblowing Policy, Supplier Management Framework & Code of Business Ethics. Any Modern Slavery risks and issues will be escalated and reviewed as part of the Group's risk management framework.

The Group Compliance team will continue to monitor our supply chain risks through our Due Diligence process.

To date, there have been no causes for concern following these audits due to the nature of our businesses, the sectors, and geolocations that we operate within.

Should any risks be brought to light in the future, or should our risk profile change, we are committed to altering our practices in response to monitoring and reducing those risks, inclusive of reporting metrics focussing on successful outcomes in combating Modern Slavery.

TRAINING FOR STAFF

All associated policies are available on the Group intranet, are reviewed periodically and all staff must adhere to these policies.

This statement will be reviewed annually and published. A full copy of this statement and a link to the Modern Slavery Act 2015 will be accessible to all employees on the Intranet and is published on the government's modern slavery registry.

The Legal and Compliance department are registered with 'Stronger Together', and will periodically review their training materials and resources in order to assess the risk to our Group and roll out training when appropriate.

This Modern Slavery Statement has been approved by the Board of Directors of Kindertons Group on 09/01/2026.

Signed on behalf of the Group

Christophe Leemanyan

Christophe Leemanyan
Kindertons MD

Next review: January 2027