Modern slavery and human trafficking statement 2023

Introduction
This statement sets out Integra's (The Company's) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. While Integra are not required to publish a statement under the Modern Slavery Act (2015), we recognise the importance of mitigating the risk of modern slavery within our business, and the benefits this delivers to society. As such, we have opted to publish this statement regarding our plans for the next 12 months in relation to modern slavery.

As part of the financial services sector, The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains
Integra is a UK based managing general agency, supplying Homeowners and Church insurance policies, in the UK only, predominantly via intermediaries for the former and a combination of direct and intermediaries for the latter.

As a financial service provider, we do not believe that we operate in a sector where there is a high risk of modern slavery practices such as forced or bonded labour occurring, nor do we purchase goods or services from organisations which we would associate with modern slavery or human trafficking. This will be confirmed by way of a modern slavery risk assessment to be undertaken prior to December 2023.

The Governance Committee are responsible for The Company's anti-slavery initiatives and have the full support of the Integra Board.

Over the next 12 months, the Company will create a supply chain map, to assist in assessing the risk posed by the supply chain in respect of modern slavery.

Relevant policies
The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** All workers, customers and other business partners of The Company are encouraged to report any concerns related to the direct activities, or the supply chains of The Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.
- **Employee Code of Conduct** This makes clear the actions and behaviour expected of all employees when representing The Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Recruitment/Agency workers policy** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency.

The Company plan to take additional actions over the next 12 months in relation to modern slavery policies, including:

- **Modern Slavery policy** The Company will create a specific modern slavery policy, summarising the approach taken to mitigating the risk of modern slavery.

- **Supplier Code of Conduct** The Company will create a code of conduct for suppliers, including modern slavery requirements, and this will be issued to all suppliers.

Due diligence
The Company undertakes due diligence when considering appointing new suppliers, and regularly reviews its existing suppliers. The Due Diligence procedures are to be reviewed, and enhanced where required, in 2024. This will include the addition of a specific modern slavery section within the due diligence.

Risk assessment and associated monitoring
The Company currently operate a risk management framework, which incorporates a review of Key Risk Indicators. Modern slavery and the risks posed will be incorporated into the Company's risk management procedures in 2024. This will include the monitoring of at least on Key Risk Indicator in relation to modern slavery.