

## Modern Slavery Statement 2016

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act") for the financial year ending 2016 by 1<sup>ST</sup> CENTRAL, a business name used by First Central Insurance Management Ltd ("FCIM").

### Organisational structure

FCIM is a subsidiary company of the First Central Group Limited and provides motor insurance intermediary, claims administration and financial services to UK customers, to read our story please [click here](#). We're committed to acting with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery or human trafficking taking place within our business or supply chain. We're committed to achieving a zero tolerance approach.

### Risk assessment

We conducted a risk assessment to identify, control and effectively manage any current or emerging risks of modern slavery within our business operations and supply chain. This assessment will be undertaken annually. The following criteria was considered:

- Our strategic partners and the services they provide
- Ours and our suppliers geographic locations
- Operations outside of the UK/EU regulatory frameworks
- Suppliers with temporary or low skilled workers

In light of our findings we've taken the following steps to eliminate any potential risks:

### Our supply chain

With over 250 suppliers in our chain including IT, Claims, Anti-Fraud, HR and Marketing providers, many of whom have global elements, we have enhanced our Supplier Management Framework, to include modern slavery factors in due diligence processing, new supplier on-boarding and ongoing relationship management and monitoring. As of 1<sup>st</sup> April 2016 suppliers were required to contractually confirm compliance with the Act, and where applicable, evidence the steps they had taken to help us reduce the risk.

### Business Policies and Operations

We've embedded internal policies and procedures to ensure that we conduct recruitment in an ethical and transparent manner. This requires that we check eligibility to work in the UK to safeguard against human trafficking and that we pay in accordance with the UK living wage. To learn more [click here](#).

We are committed to ensuring all employees, with emphasis on senior managers, procurement advisors, and HR professionals are provided with sufficient information which allows them to identify signs of modern slavery and human trafficking, and how best to escalate concerns.

Our Whistleblowing Policy and dedicated telephone line enables all employees to raise concerns about how colleagues are being treated, identify risks of modern slavery or how we operate and to do so without the fear of repercussions.

Going forward we understand the need to keep driving new initiatives and to enhance our business controls against the risks of modern slavery if we are to achieve a zero tolerance approach.

This statement was approved by the Board of Directors on 11/05/2017.

A handwritten signature in black ink, appearing to read 'Andy James', written over a light blue horizontal line.

Andy James, CEO First Central Insurance Management Ltd.