



## **Modern Slavery and human trafficking statement for financial year ending 31 March 2019**

### **Organisation Structure**

Global Risk Partners Limited (“GRP”) is registered in England and Wales under company registration number 8613882. Registered office: 50 Fenchurch Street, London, EC3M 3JY.

GRP has a number of subsidiaries and is one of the largest independent insurance intermediaries in the UK – details of all subsidiaries can be found on [www.grpgroup.co.uk](http://www.grpgroup.co.uk) (together, the “GRP Group”).

This statement covers the activities of the GRP Group which is headquartered in London and has over 1,300 employees in subsidiaries within the United Kingdom and Republic of Ireland. We do not have any subsidiaries or employees based in other territories.

### **Our Approach**

The GRP Group is committed to conducting its business in a fair, honest and open manner in compliance with all relevant laws and regulations. We seek to promote appropriate behaviour across all aspects of our business operations whilst ensuring fair and consistent outcomes for our stakeholders.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited. The GRP Group is 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.

### **Supply chain management**

The GRP Group performs an important role in the insurance distribution chain dealing with its end customers, brokers, underwriting agents, insurers and other insurance market participants. However, we believe that we are at low risk of human trafficking and slavery occurring within our business or supply chain as we do 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 us are also not considered likely to be susceptible to this risk.

However, employees responsible for managing suppliers and others involved with the GRP Group are responsible for ensuring that our values and ideals are upheld. GRP continues to review its supply chain in line with identifiable risks and ensure this information is shared within the Group. We continue to ensure that our contracts include appropriate protections and serious violations by suppliers would lead to the termination of the business relationship.

### **Relevant Policies**

GRP operates a number of policies that mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations.

- **Employee Code of Conduct**

GRP prides itself on being open and informative with regards to employment. We are intent on advancing equality and diversity within all our key activities, and believe this to be ethically right and socially responsible. Equality and diversity are essential factors that contribute to the strength and

continued growth of any business. Our Code of Conduct is contained within the employee handbook and is accessible to all employees.

- **Whistleblowing Policy**

We aim to ensure that all individuals working within the business feel comfortable to raise concerns and challenge poor practices and behaviours related to direct activities or in our supply chains.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy is designed to make it easy for individuals to make disclosures, without fear of retaliation and includes reference to external bodies. We are implementing a confidential helpline for those that wish to raise a concern.

All staff undertake training on Whistleblowing and are required to read and acknowledge the GRP Group Whistleblowing Policy.

- **Recruitment and Selection Policy**

We use only specified, reputable employment agencies to source labour. All subsidiaries 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.

We 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.

- **Training Policy**

All employees will be undertaking a Modern Slavery training course to ensure that there is appropriate awareness within the business.

We will be considering whether any specific employees might need more in-depth training.

### **Internal Audit**

All GRP subsidiaries are subject to periodic audits. Core audit work will include an assessment of the basic working conditions of our staff. In addition, consideration is being given to a thematic audit of our ability to oversee controls discharged by third party suppliers.

### **Corporate social responsibility**

We recognise that our business doesn't exist in isolation nor is it simply a way of making money. We recognise that our employees depend on our business being successful, that customers, suppliers and the local community are all affected by our business and what we do and the way in which we do it.

We work to understand the impact that the GRP has on the wider world and consider at all times, how we can use this impact in a positive way.



At GRP we adopt a responsible attitude, often going beyond the minimum legal requirements and working to minimise any negative impact our business may have.

GRP often becomes involved in charitable and not for profit initiatives supporting local, national and international causes. We are in the process of establishing a charitable foundation to provide financial donations to charities nominated by our employees.

### **Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the GRP Group's slavery and human trafficking statement for the financial year ending **31 March 2019**. This statement has been approved by the Global Risk Partners Limited board of directors, who will review and update it annually.

**David Margrett**  
**Chief Executive**