

## **Modern Slavery statement for the financial year 1 January to 31 December 2016**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out BHSF Group Limited's approach to understand all potential modern slavery risks related to its business, and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities implemented during the financial year 1 January 2016 to 31 December 2016.

Modern slavery encompasses slavery, human trafficking and forced labour. BHSF Group Limited recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery, human trafficking and forced labour in its corporate activities.

### **Organisational structure**

BHSF Group Limited and its subsidiary companies provides medical expense insurances, other insurances, a range of employee benefits services and occupational health services to 3,100 client businesses and 240,000 policyholders plus their families.

#### *Countries of operation and supply*

The organisation currently operates in the UK and the Republic of Ireland and all products and services are sourced within these geographical areas.

Much of the supply chain is regulated/governed by professional bodies and is part of a sector and geographical location where slavery and human trafficking is considered low risk.

#### *High-risk activities*

There are no activities within the business operations taking place that are considered to be at high risk of slavery or human trafficking.

#### *Responsibility*

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Those policies listed in the Relevant Policies below have been approved and adopted by the organisation and are reviewed on an annual basis.
- **Training:** The Group HR Director attended external briefings on the impact and requirements of the Modern Slavery Act, with relevant information cascaded down to the HR team. Enhancements to the recruitment policy and recruitment processes throughout the Group have been made as a result.

### **Relevant policies**

BHSF operates the following internal policies that ensures it conducts business in an ethical and transparent manner.

- **Whistleblowing policy** – this policy is in place to allow all employees to be able to report any concerns about how their colleagues are treated or to report any concern regarding our business practices. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. This whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

- **Employee code of conduct** – Our code of conduct makes it clear to all of our employees the actions and behaviours expected of them when representing the organisation. BHSF strives to maintain the highest standards of employee conduct and ethical behaviour in all of our operations.
- **Recruitment policy** – BHSF uses specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting candidates from that agency. The recruitment policy is comprehensive and ensures that each new employee has the right to remain and work in the UK, an important and most relevant measure to address the risk of slavery and human trafficking within our organisation.

### **Performance indicators**

During the financial year to December 2016 there have been no reports of any slavery and/or human trafficking taking place within our business. This has been certified by:

- All new employees engaged throughout the year have been confirmed through our rigorous recruitment processes as having the right to remain and work in the UK;
- All employees within the Group meeting the requirements of the National Minimum Wage;
- There having been no reports received from employees, the public or any law enforcement agency to indicate that any form of modern slavery practices have been identified.

### **Board approval**

This statement has been approved by the board of directors of BHSF Group Limited who will review and update it annually.

Director's signature:



Director's name: **David Nuttall**

Date: **19 July 2017**