

# Modern Slavery & Human Trafficking Policy



This Policy is applicable to MAPFRE ASISTENCIA, Insure & Go Insurance Services Ltd, Travel Claims Services Ltd and Abraxas Insurance Administration Services LTD.

## 1. Scope of this Policy


The Modern Slavery and Human Trafficking Policy has been prepared to ensure that MAPFRE ASSISTANCE adheres to its legislative obligations under the Modern Slavery Act 2015.

It applies to all staff within MAPFRE ASSISTANCE, Insure & Go Insurance Services Ltd, Travel Claims Services Ltd and Abraxas Insurance Administration Services Ltd and should be followed accordingly. Additionally, it applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

The term “we”, “our”, or “business” as used within this statement refers to MAPFRE ASSISTANCE, Insure & Go Insurance Services Ltd, Travel Claims Services Ltd and Abraxas Insurance Administration Services Ltd.

## 2. Policy Statement

MAPFRE ASSISTANCE is dedicated in being transparent and working collaboratively to help end modern slavery. This policy refers to MAPFRE ASSISTANCE’s pledge to prevent modern slavery in our own operations and supply chains as well as its ongoing commitment to improve its practices.

 Modern slavery is a crime and violation of human rights; it takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking.

Any individual providing professional services to MAPFRE ASSISTANCE is required to follow our Modern Slavery and Human Trafficking Policy and the Code of Conduct and Ethics Policy. We have a zero tolerance policy towards anyone who infringes the law or the basic principles set forth within these policies.

We expect the same high standards from all of our third party suppliers and business partners. As part of our due diligence processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our third party suppliers and business partners ensure their own supply chain to the same high standards.

This policy does not form part of any employee’s contract of employment and we may amend it at any time.

## 3. Responsibility for this Policy

The Compliance & Risk Department has responsibility for ensuring this policy complies with our legal and ethical obligations. It is also responsible for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

## 4. Compliance with this Policy


All staff within MAPFRE ASSISTANCE, Insure & Go Insurance Services Ltd, Travel Claims Services Ltd and Abraxas Insurance Administration Services Ltd must ensure that they have read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Any activity that might lead to, or suggest, a breach of this policy should be avoided.

All employees must notify the Compliance & Risk Department as soon as possible if they believe or suspect that a breach of this policy has occurred using the Issues & Breaches Notification Procedure (See Annex 1).

Employees are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage to the Compliance & Risk Department Suspicious Activity Reporting Procedure (See Annex 1).

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or the Compliance & Risk Department.

 The business encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

## 5. Training on this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given during new staff induction training.

A zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship and reinforced as appropriate thereafter.

## 6. Breaches of this Policy

Any employee within MAPFRE ASSISTANCE, Insure & Go Insurance Services Ltd, Travel Claims Services Ltd and Abraxas Insurance Administration Services Ltd who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf of any MAPFRE ASSISTANCE firm if they breach this policy.