

Modern Slavery and Human Trafficking Statement

Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc

This Modern Slavery and Human Trafficking Statement (“Statement”) is made on behalf of the following companies: Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc, both part of Pinnacle Pet Group (“PPG”). Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc are subsidiary companies of Pinnacle Pet Group Limited.

The UK’s Modern Slavery Act 2015 (“MSA”) requires large organisations doing business in the UK to produce a “slavery and human trafficking” statement. The MSA applies to an organisation’s subsidiaries and any parent organisation if they carry on a business or part of a business in the UK.

This Statement sets out Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc’s slavery and human trafficking statement pursuant to Section 54(1) MSA and describes the steps that they have taken to ensure that slavery and human trafficking are not taking place in its direct operations or supply chains.

The Board attests that Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc comply with this Statement through the information provided by the business. This Statement relates to the financial year ending 31 December 2022.

Introduction

Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc have a responsibility to comply with UK law and commit to preventing acts of modern slavery and human trafficking within its business and supply chain whilst at the same time expecting the same from its suppliers and partners. This commitment is, in part, based on the International Labour Organisation’s fundamental principles of rights to work, which we uphold and which include:

- a) elimination of forced and compulsory labour;
- b) abolition of child labour; and
- c) elimination of discrimination in respect of employment and occupation.

This Statement outlines the policies and procedures which Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc have in place to mitigate and manage the potential risks of modern slavery and human trafficking in its operations and supply chains.

Policies

Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc review their business policies annually to ensure that it takes a consistent and comprehensive approach to the risks of and issues related to modern slavery and human trafficking.

We have specific procedures in place which guide and inform our approach to tackling any risks or issues related to modern slavery and human trafficking across our business and supply chains.

We have a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in dealing with our partners, suppliers and customers, and to implementing and maintaining systems and controls that effectively ensure modern slavery and human trafficking are not taking place anywhere in our business or that of our supply chain.

Our policies contribute to tackling modern slavery and human trafficking as part of our business operations and include the following (which are currently under review and in the process of being revised and updated):

Modern Slavery Policy
Procurement Policy
Code of Conduct

Whistleblowing Procedures
UK Staff Handbook

Identifying and managing risks

Earlier work was carried out by Pinnacle Insurance plc with external advisors across its supply chains and procurement processes to identify where there may be risks of modern slavery or human trafficking. This showed that overall there is a low risk, as the company's activities do not directly involve operations where modern slavery or human trafficking are known to occur.

However, some categories of products and services provided by third party suppliers present risks in their supply chains. These are identified within internal processes and procurement of new suppliers includes additional due diligence, including the extension of our supplier on-boarding questionnaires to cover the risks of slavery and human trafficking and requesting information about the supplier's own policies and mitigation processes.

Suppliers are also required to evidence their adherence to codes of conduct which prohibit forced or child labour and our contract terms explicitly require suppliers to comply with the MSA together with including a right of audit of suppliers where material concerns are raised. These steps are reinforced with appropriate contractual obligations by the supplier in on-going contractual arrangements with our companies.

Employees and suppliers are encouraged to raise any concerns about any issues or suspicion of modern slavery within our business operations or any tier of our supply chain as soon as they become aware of it. Our whistleblowing procedure ensures that anyone raising such concerns may request that their disclosure is kept strictly confidential.

Our Procurement function has extensive and rigorous risk management processes in place. In addition, modern slavery and human trafficking risk is included in the risk management process, and is managed and monitored on an ongoing basis by the vendor risk management function in conjunction with other relevant business functions.

Awareness and Training

Staff involved in procuring products and services in those categories where there is a potential supply chain risk are provided with additional guidance and training, which they are required to repeat annually.

This statement is owned by the executive management of Pinnacle Insurance Plc and Pinnacle Insurance Management Services Plc and approved by the Board of Directors. It is reviewed annually and published on our website.

Signed.....
DocuSigned by:
Matthew Lorimer
AA3A833A0F9140A

Name.....
Matthew Lorimer

Title.....
General Counsel

Date.....
08-Dec-2023 | 01:54 PST