

# Modern Slavery Act 2015 Policy

We oppose all forms of slavery. We make this statement to set out the steps we have taken to adhere to the requirements of the Modern Slavery Act 2015 (section 54) and to reflect a drive to eradicate modern slavery in commercial organisations within our supply chain.

## Our Business and Supply chain

QOVER SA is a Belgian company that operates as an insurance administrator and insurance managing agent on behalf of the capacity of several insurance companies. Qover is authorized by the FSMA (Belgian authority for financial services and markets) entitled to provide insurance distribution services on the basis of the freedom of services.

Qover employs over 35 people (2020), the majority of whom are based in Belgium.

Qover transacts business with partners and customers in Europe and in the United Kingdom.

## Our Position to slavery and human tracking

Qover has a zero-tolerance approach to modern slavery and human tracking and opposes all forms of slavery, servitude, forced or compulsory labour (including child labour), drug trafficking, sex trafficking, human trafficking and unpaid labour.

Qover will apply this policy to all its business, including to Qover's employees, directors, contractors and business partners amongst others.

As an insurance intermediary, Qover does not operate in a sector where modern slavery is prevalent and has not identified any modern slavery concerns.

## Our Policies and Governance

Qover's board provides the necessary leadership to implement strong corporate governance across the company so that all decisions are based on transparency, integrity, responsibility and performance, which promotes the long-term sustainability and ongoing success of our business.

Qover has Internal Policies in relevant areas, including a financial crime policy, employee conduct policy, anti-bribery and corruption policy and a whistleblowing policy.

Qover continues to review and strengthen relevant policies and standards to ensure they remain up to date and compliant with modern slavery requirements.

## **Our due diligence**

Qover employees are encouraged to report genuine concerns about any conduct or activity they believe is dishonest, corrupt, inappropriate, exploitative or illegal and Qover offers several channels to do it, for example, the Whistleblowing policy.

## **Third-party due diligence**

As a regulated and responsible company, Qover always works to the highest professional standards and complies with all laws and regulations applicable to Qover's business. Qover expects the same high standards from those parties with whom it engages. It is Qover's intention to only contract with third parties who can satisfy Qover's standards with regards to employment and welfare conditions.

Qover takes into account three risk factors to help identify and monitor the risk of slavery and human trafficking:

- The country the third-party operates in;
- The sector the third-party operates in;
- The products produced, manufactured or supplied by the third-party;

Qover reserves the right to request information concerning, amongst other things, health & safety, environment, equality, anti-corruption and insurance protection.

## **Training**

Qover ensures that all employees who have responsibility for procurement within Qover's company have appropriate knowledge in order to identify issues related to slavery and human trafficking and review standard terms with suppliers as a means of ensuring disclosure and compliance.

## **Monitoring and evaluation**

Qover is committed to continuous improvement and acknowledge that Qover is on a journey to ensure Qover has adequate policies, processes, systems and controls in place to identify and mitigate modern slavery issues and risks within its business and supply chains.

This statement has been approved by the Board on 09/07/2020. It will be reviewed and updated annually.