Modern Slavery Statement approved by the Board of Directors

For the Financial Year Ending: 31st March 2026

1. Introduction

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2015. It sets out the steps we have taken to prevent modern slavery and human trafficking within our business operations and supply chain.

We are committed to acting ethically, with integrity, and to implementing effective systems and controls to ensure modern slavery does not occur in any part of our business.

2. Our Business

We are a Gibraltar-based insurance company, operating a UK establishment (branch), writing UK located motor insurance. Our operations include:

- UK-based employees
- Outsourced claims handling and support services
- Technology, cloud, and data-processing suppliers
- Facilities, cleaning, and maintenance providers
- Professional services and consultancy partners

We recognise that certain areas of our supply chain may present higher risks, particularly where labour-intensive or offshore services are involved.

3. Our Supply Chain

Our supply chain includes:

- IT and cloud infrastructure providers
- Claims management and accident repair networks
- Contact centre and customer service partners
- Recruitment agencies
- Facilities management, cleaning, and security services
- Professional advisers and consultants

We expect all suppliers to uphold the same high standards we apply internally.

4. Our Policies, Frameworks and Standards

We maintain a comprehensive governance framework that supports our approach to preventing modern slavery, including:

- Modern Slavery Policy
- Outsourcing and Third Party Management Framework
- Whistleblowing Policy
- Recruitment & Vetting Standards

Our policies and frameworks are reviewed annually and, where applicable, approved by the Board.

5. Due Diligence & Risk Assessment

We are incorporating modern slavery considerations into our proportionate, risk-based supplier due diligence arrangements, including the periodic reviews of relevant material suppliers. This includes, where applicable and deemed necessary:

- Pre-contract due-diligence questionnaires
- Screening for high-risk jurisdictions or sectors
- Reviewing supplier modern slavery policies
- Contractual clauses requiring compliance with the Modern Slavery Act
- Ongoing monitoring and periodic reassessment

Higher-risk suppliers may be subject to enhanced due diligence, including audits or independent verification.

6. Training & Awareness

We provide mandatory training to:

- All employees at induction
- Senior managers and directors as part of governance training

7. Reporting Concerns

We encourage employees to report concerns through:

- Internal whistleblowing channels
- Anonymous reporting mechanisms
- Direct escalation to our Risk & Compliance team

Concerns raised through these arrangements are handled in accordance with CICL's Whistleblowing Policy. We do not tolerate retaliation against whistleblowers.

8. Effectiveness & KPIs

To measure our effectiveness, we monitor:

- Completion rates for training
- Supplier due-diligence completion and risk ratings

- The number of reported concerns or incidents
- Audit findings and remediation actions

We continue to strengthen our controls and improve transparency across our supply chain.

9. Future Commitments

Over the next financial year, we will, where applicable:

- Enhance supplier monitoring and risk scoring
- Review and update contractual clauses
- Increase engagement with key suppliers
- Publish our statement on the Modern slavery statement registry - GOV.UK (recommended by the UK Home Office)

10. Board Approval

This updated statement has been approved by the Board of Directors on 23rd November 2026

Peter Guillan

Director – Risk & Compliance

Date: 23rd November 2026