



Modern Slavery Act Statement

This statement applies to Aston Lark Group Limited and subsidiary companies (“the Group/we/our/us”) and is made pursuant to section 54(6) of the Modern Slavery Act 2015 (the “Act”). It constitutes the Group’s slavery and human trafficking statement for the financial year ended 31 December 2021.

We are committed to combatting slavery and human trafficking within our business operations and supply chains. This statement details the actions we have taken, and the policies and procedures we have identified, in order to comply with the Act.

Our Structure, Business Model and Supply Chains

The Group comprises well-respected insurance brokers, employee benefit advisors and MGAs based primarily in the United Kingdom, Guernsey, and Ireland. We operate from over 61 regional locations, employ over 1,700 staff across our key trading divisions, UK Retail intermediaries, London Market insurance, Managing General Agency, and European business where we operate as agents of insurers, and as an intermediary and agent on behalf of clients.

Our supply chain includes hardware and software providers, insurers, claims administration providers, and professional service suppliers.

We support, and are committed to, the welfare of all of our staff in terms of pay, working hours, environment, health and safety, and wellbeing. We will not tolerate violations of basic human rights or employment practices by any staff or within our supply chain. Our staff are engaged on full-time, part-time, or flexible working arrangements and are appropriately remunerated and incentivised. Contractors may be employed by the Group from time to time, but these are generally professional workers for specific projects.

Our Policies on Slavery and Human Trafficking

Our Code of Ethics reflects our commitment to acting ethically and with integrity in all our business relationships. Policies underpin our overall control and governance structure, as well as supporting our culture. They are reviewed and updated as appropriate in line with changes to best practice and/or legislation.

We pay all staff at least the National Minimum Wage and have in place an Employee Assistance Programme and a range of other benefits, including an active staff wellness programme.

Our Due Diligence Process, Risk Assessment and Management

Our staff are insurance brokers, employee benefit advisors and MGAs, or provide professional

services to the Group, for example, HR representatives and accountants. We believe that insurance is not deemed to be a key inherent risk sector as our staff work in roles that are office-based, and/or generally require specialist qualifications. Therefore we have assessed our risk of modern slavery to be low.

As part of the pre-employment and recruitment process for our staff, we ensure that all candidates are legally permitted to work within the UK, that they are joining of their own free will and are not coerced to join us. Our financially regulated firms also undertake background and financial checks for all staff. We require our suppliers to operate in a similar manner in context of the services they provide to us.

We have no tolerance for slavery and/or human trafficking. In order to ensure that our partners in our supply chain uphold our values, it is a requirement that all contracts stipulate compliance with the Act.

Our Training and Effectiveness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training for all our staff. We raise awareness of conduct, human rights and, inclusion and diversity amongst our staff through annual mandatory training via an e-learning portal.

We encourage staff to report all potential or actual incidents that relate to wrongdoing, actual or suspected illegal or serious inappropriate activity, whether related to modern slavery or not. A confidential, externally facilitated portal is provided for staff to report their concerns confidentially.

During the year ended 31 December 2021 there were no incidents relating to modern slavery or violations of human rights identified and no incidents were reported by staff or relating to our supply chain or suppliers themselves.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2021.

This statement has been approved by the Aston Lark Group Limited Board, on behalf of the Group, on 25 January 2022.

Peter Blanc

Chief Executive Officer