

## Modern Slavery and Human Trafficking Statement

### Introduction

Divergent Group & Subsidiaries is committed to preventing modern slavery and human trafficking in its business activities and supply chains. This statement outlines the steps we have taken and continue to take to ensure that modern slavery is not taking place within our organization or our supply chains.

### Our Business

Divergent Group & Subsidiaries is a micro SME operating in the insurance brokerage sector in the UK. We provide a range of insurance products and services to our clients. Our supply chains include suppliers of office equipment, IT services, and professional services.

### Our Policies

We have implemented the following policies to prevent modern slavery and human trafficking:

- **Anti-Slavery Policy:** Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships.
- **Supplier Code of Conduct:** We expect our suppliers to adhere to the same high standards. Our Supplier Code of Conduct includes specific prohibitions against the use of forced, compulsory, or trafficked labour.

### Due Diligence Processes

We conduct due diligence on our suppliers to ensure compliance with our policies. This includes:

- Assessing potential risk areas in our supply chains.
- Requiring suppliers to confirm their compliance with our Anti-Slavery Policy.

### Training

We provide training to our employees to ensure they understand the risks of modern slavery and human trafficking and can identify and report any concerns.

### Reporting Concerns

We encourage all employees, suppliers, and other business partners to report any concerns related to modern slavery or human trafficking. Reports can be made confidentially through our whistleblowing policy.

### Review and Monitoring

We regularly review and monitor our policies and procedures to ensure their effectiveness in preventing modern slavery and human trafficking.

### Approval

This statement has been approved by the Divergent Group & Subsidiaries Board of Directors and will be reviewed annually.

---

A J R Petty  
Group CEO  
27/7/2024

---

## Anti-Slavery Policy

### Introduction

Divergent Group & Subsidiaries is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This policy outlines our approach to preventing modern slavery and human trafficking in all our operations.

### Scope

This policy applies to all employees, contractors, suppliers, and other business partners of Divergent Group & Subsidiaries.

### Our Commitment

Divergent Group & Subsidiaries is dedicated to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

### Our Policies and Procedures

To support our commitment, we have established the following policies and procedures:

- **Supplier Code of Conduct:** We require all suppliers to adhere to our Supplier Code of Conduct, which includes strict prohibitions against the use of forced, compulsory, or trafficked labour.
- **Recruitment Policy:** Our recruitment processes include rigorous checks to ensure that all employees have the legal right to work in the UK and are not being exploited.
- **Whistleblowing Policy:** We encourage all employees, suppliers, and business partners to report any concerns related to modern slavery or human trafficking. Reports can be made confidentially and without fear of retaliation.

### Due Diligence

We conduct due diligence on our suppliers to ensure compliance with our anti-slavery policies. This includes:

- Assessing potential risk areas in our supply chains.
- Conducting supplier audits and assessments.
- Requiring suppliers to confirm their compliance with our Anti-Slavery Policy.

### Training and Awareness

We provide training to our employees to ensure they understand the risks of modern slavery and human trafficking and can identify and report any concerns. This training is part of our induction process and is refreshed regularly.

### Monitoring and Review

We regularly review and monitor our policies and procedures to ensure their effectiveness in preventing modern slavery and human trafficking. This policy will be reviewed annually and updated as necessary.

### Responsibility for the Policy

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

### Approval

This policy has been approved by the Divergent Group & Subsidiaries Board of Directors and is signed by:

---

A J R Petty  
Group CEO  
27/7/2024

---

## Supplier Code of Conduct

### Introduction

Divergent Group & Subsidiaries is committed to ensuring that modern slavery and human trafficking do not occur in our business or supply chains. This Supplier Code of Conduct outlines the standards and practices we expect from our suppliers to uphold our commitment to ethical business practices.

### Scope

This Code of Conduct applies to all suppliers, contractors, and business partners of Divergent Group & Subsidiaries.

### Our Expectations

We expect our suppliers to adhere to the following principles:

#### 1. Prohibition of Forced Labour

- Suppliers must not use any form of forced, bonded, or compulsory labour.
- Workers must have the freedom to leave their employment after reasonable notice.

#### 2. Prohibition of Child Labor

- Suppliers must not employ individuals under the age of 18 for any hazardous work.
- Suppliers must comply with all applicable child labour laws and regulations.

#### 3. Fair Wages and Working Conditions

- Suppliers must ensure that wages paid to workers meet or exceed legal minimum wage requirements.
- Working hours must comply with national laws and industry standards.
- Suppliers must provide safe and healthy working conditions for all employees.

#### 4. Freedom of Association

- Suppliers must respect the rights of workers to form and join trade unions and bargain collectively.

#### 5. Non-Discrimination

- Suppliers must not discriminate against workers based on race, colour, religion, gender, sexual orientation, age, disability, or any other protected characteristic.

#### 6. Ethical Recruitment

- Suppliers must ensure that recruitment practices are ethical and transparent.
- No worker should pay for a job; recruitment fees and related costs must be borne by the supplier.

### Due Diligence and Compliance

Suppliers must conduct due diligence to ensure compliance with this Code of Conduct.

- Suppliers must provide Divergent Group & Subsidiaries with access to relevant records and documentation to verify compliance.
- Suppliers must promptly address any issues of non-compliance and take corrective actions as necessary.

### Reporting Concerns

- Suppliers must have mechanisms in place for workers to report concerns related to modern slavery and human trafficking without fear of retaliation.

# DIVERGENT GROUP LTD

- Suppliers must report any concerns or violations of this Code of Conduct to Divergent Group & Subsidiaries immediately.

## **Monitoring and Review**

- Divergent Group & Subsidiaries reserves the right to audit suppliers to ensure compliance with this Code of Conduct.
- This Code of Conduct will be reviewed regularly and updated as necessary to reflect changes in laws and best practices.

## **Acknowledgment and Acceptance**

By accepting this Code of Conduct, suppliers agree to comply with its terms and conditions and to uphold the principles of ethical business practices.

---

A J R Petty  
**Group CEO**  
**27/7/2024**

---