

## **INTRODUCTION**

This Slavery and Human Trafficking Policy is made pursuant to Section 54 of the Modern Slavery Act 2015 ("the Act") relating to Transparency in Supply Chains. Anexo Group Plc ("Anexo") ("Company") recognises that it has a responsibility to take a robust approach to slavery and human trafficking and indeed takes a zero-tolerance approach to non-compliance with the Act in any part of its business or its supply chain.

We are taking the appropriate steps to ensure that everyone who works for Anexo benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

## **OUR BUSINESS AND ORGANISATIONAL STRUCTURE**

Anexo comprises various business units under a number of reporting divisions, namely, specialist Credit Hire and Legal Services, with a focus on providing replacement vehicles to consumers who have been involved in a non-fault accident, serious injury claims, housing disrepair claims, clinical negligence and group actions. We pride ourselves on our approachable, collegial and team based way of working. We believe that our licence to operate, our business sustainability, and the attainment of our vision depend on our ability to inspire trust and earn the confidence of the people we work with.

Anexo is the parent company of the Anexo group of companies (the "Anexo Group"). The Anexo Group has over 1000 employees and operates solely in the UK with its head office in Liverpool.

## **OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING**

Our commitment to human rights and the eradication of modern slavery is overseen by our Board of Directors. We recognise the interdependence of culture and controls and believe that we can achieve more if our people, business partners and suppliers understand the importance of their roles and take individual and collective responsibility in helping to eliminate the risk of modern slavery.

This policy reflects that commitment to acting ethically and with integrity in all the Anexo Group's business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the supply chains.

Anexo operates under a number of policies, all of which are signed off at Director level, which demonstrates our commitment to eradicating the risk of modern-day slavery and ensuring that business is conducted to the highest ethical standard including:

- The Recruitment Policy
- Anti-Bribery Policy
- Share Dealing Policy
- Equality & Diversity Policy
- Treating Clients Fairly & Vulnerable Persons Policy

Anexo has an effective grievance and whistleblowing policy in place which encourages personnel to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated promptly and discreetly, consistent with adequate investigation and remediation. Anexo's policies are reviewed annually to ensure that they are fit for purpose. All new and existing Anexo employees are provided with, and have access to, a copy of the latest whistleblowing policy. The Company and its employees are vigilant in all aspects of the chain of supply and the relationships with its employees, clients and suppliers.

## **OUR SUPPLY CHAINS**

At Anexo, we recognise that our supply chain is critical to our success. We, therefore, seek to build lasting relationships, treating our business partners fairly and paying promptly. We want to form partnerships with businesses that share our values and support us in delivering our purpose. We are committed to working with our supply chain to ensure that together we can achieve wider social, economic and environmental benefits.

We use a variety of methods to undertake due diligence on each of our partners and ensure that we work with organisations that share our commitment to the highest possible business and ethical standards. This allows us to make informed decisions about who we want to work with. Where we are satisfied that it is a supplier that we want to engage with, we then negotiate appropriate terms with them. To the extent that our partners do not adhere to our standards, there can be material consequences, including the termination of our relationship with them.

Anexo assesses compliance within its existing supply chain and will assess any new partners for compliance with the following criteria:

- no forced labour or human trafficking is practised, and employment is freely chosen;
- working conditions are safe and hygienic;
- working hours are not excessive;
- a fair wage is paid;
- no harsh, cruel or degrading practices are allowed; and
- no discrimination is practised.

A failure to comply with the above is an absolute bar to pre-qualification for a partnership with Anexo.

## **RISK MANAGEMENT**

All contract risks, including potential human rights, modern slavery and human trafficking risks, are managed and monitored through their contract lifecycle. This requires rigorous assessment at precontract signing, business unit and divisional level and review at Director level.

To manage the potential risks relating to employee vulnerability, the well-being of all our colleagues (whether working in the field or in the office) has remained our priority.

At Anexo, our goal is to create working environments that protect, support and make our employees happy and healthy. Employee well-being is our priority, and we all have a responsibility to ensure we look after ourselves and each other. We continue to develop our culture, so that well-being becomes an intrinsic part of everything all of our employees do. We focus on helping to ensure the right working environments to support the safety and mental health of our people, which includes processes for colleagues to raise reasonable adjustment requests where required.

## **TRAINING, RECRUITMENT & COMMUNICATION**

Anexo is committed to ensuring that all our people understand what modern slavery is, the circumstances in which it may occur and that they are equipped to identify instances of possible slavery and human trafficking and to report concerns.

To make employees aware of the Act and the drivers of modern slavery, as well as the possible indicators, we share this statement with all employees through our internal communication channels and a copy of this statement is available on the Anexo website (<https://www.anexo-group.com/>).

To detect any modern slavery in our business or supply chains, we encourage for any concerns to be reported without delay or fear of detrimental treatment. Our modern slavery policy requires anyone who becomes aware of or suspects modern slavery in our business or supply chains to report it to

Samantha Moss or, if they wish to report anonymously, they may do so as set out in the group's whistleblowing policy.

Anexo's employment policies and pre-employment screening processes ensure that all our employees have the appropriate right to work in the United Kingdom. As part of the onboarding process for joining Anexo, each employee is given an overview of the essential policies and information in relation to those policies, procedures and other matters such as whistleblowing.

#### **KEY PERFORMANCE INDICATORS ("KPIs")**

Consideration is given to the key performance indicators that Anexo may choose to use in tracking our progress in reducing modern slavery risks. The indicators we choose will help to deliver an increase in awareness, especially within our key partnerships and amongst site operative teams.

#### **CURRENT AND FUTURE PLANS**

- Continue to regularly review and improve our internal and partner risk assessment processes.
- Continue to educate and promote the Company's whistleblowing policy, within our business, encouraging all of our employees or those working on our behalf to raise any concerns.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Anexo's slavery and human trafficking statement for the financial year ended 31 December 2024. This policy applies to Anexo Group Plc and all of its subsidiary companies. The policy has also been approved by the Boards of Directors of the following group companies on today's date:

- Anexo Group Plc;
- Bond Turner Limited;
- AMS Legal Services Limited;
- Direct Accident Management Limited; and
- Professional and Legal Services Limited.

Dated: 25 June 2025

Alan Sellers

Chairman