

ACCIDENT EXCHANGE LIMITED

STATEMENT UNDER SECTION 54 OF THE MODERN SLAVERY ACT 2015

Introduction

This is a statement on behalf of Accident Exchange Limited and its subsidiary companies (“**AEL Group**” or “**we/us/our**”) under section 54 of the Modern Slavery Act 2015 (“**the Act**”) for the financial year ended 28 February 2017.

AEL Group is committed to identifying and challenging any instance of modern slavery and human trafficking in its businesses and that of its supply chains.

AEL Group has a Whistleblowing Policy and Anti-Slavery Policy, readily available to all staff on our intranet. We encourage staff to report concerns over any aspect of the conduct of our business or that of our suppliers to our Company Secretary or CEO.

Organisational structure

AEL Group has its head office in Birmingham and branch offices in Belfast, Glasgow, Warrington and Dartford as well as a subsidiary based in Stockport. We have over 400 members of staff and operate our business in the United Kingdom.

AEL Group’s core business activities include:

- the supply of temporary replacement vehicles on credit hire to motorists involved in non-fault accidents and the management of their claims (supplied through Accident Exchange Limited)
- software solutions to the retail motor trade (supplied through DCML Limited)
- the supply of vehicle telematics to car dealer groups and fleet companies (supplied through In-Car Cleverness Limited)
- asset protection, accident investigation and vehicle hire rate survey services (supplied through APU Limited)

AEL Group Supply Chains

Our supply chains include:

- Vehicle manufacturers and vehicle rental companies – supply of fleet
- Franchised Motor Dealers – supply of fleet and referral of claims
- Vehicle Repairers – repair of fleet and customers’ damaged vehicles
- Vehicle Recovery Providers – recovery of customers following an accident

- Insurance underwriters – provision of underwriting services in relation to insurance products offered by AEL Group
- Technology Providers – for the supply of vehicle telematics hardware
- Professional Services – legal, accounting, IT, automotive engineers, building maintenance services

Our policies on slavery and human trafficking

AEL Group is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence

Our business activities are predominantly based in the United Kingdom and involve dealing with large corporate entities that we expect to be compliant with all relevant legislation affecting them. We have not to date identified or had any indication that any party in our supply chains may be in breach of the Act.

However, as part of our initiative to identify and mitigate risk, AEL Group:

- has adopted an Anti-Slavery Policy
- has a Whistleblowing Policy
- Protects whistleblowers
- includes provisions in contracts with suppliers requiring compliance with the provisions of the Act
- seeks to identify and assess potential risk areas in our supply chains

Resources

We have zero tolerance to slavery and human trafficking. We have a dedicated compliance team, which consists of representatives from the following departments, who understand the requirements of the Act:

- Legal
- Finance
- Human resources
- Sales

Training

To assist with understanding the risks of modern slavery and human trafficking in our supply chains and our business, we are reviewing staff training with a view to providing targeted training on modern slavery and human trafficking to relevant members of staff.

Our effectiveness in combating slavery and human trafficking

Whilst we have never been made aware of any practices that would constitute a breach of the Act, either in our business or our supply chains, we are absolutely committed to continue to focus on this area. We have included in our principal contracts obligations on our suppliers to comply with the provisions of the Act and will consider the implementation of processes to ensure that we can monitor and identify the risk factors giving rise to modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 28 February 2017.

Lucy Woods

CEO

November 2017