

## Modern Slavery Statement 2018

*This statement is made in accordance to section 54(1) of the Modern Slavery Act 2015 ("the Act") for the financial year ending 31st December 2018 by 1<sup>ST</sup> CENTRAL, a business name used by First Central Insurance Management Limited ("FCIM").*

### Organisational structure & commitment

FCIM is a subsidiary company of First Central Group Limited. It provides insurance intermediary and premium finance services to its customers and claims handling and policy administration services to insurers. To read our full story click [here](#). At FCIM, we're committed to acting with integrity and transparency in all business dealings and put effective systems and controls in place to safeguard against any form of slavery or human trafficking within our business or supply chain. We're committed to achieving a zero-tolerance approach.

### Risk assessment

We conducted our annual risk assessment to identify, control and effectively manage any actual or potential risks of slavery within our business operations and supply chain. The following criteria were considered:

- Our strategic partners and the services they provide
- Ours and our suppliers' geographical locations
- Operations outside of the UK/EU regulatory frameworks
- Suppliers with a temporary or low-skilled workforce
- Employee screening for identity, criminal record and taking references

In the light of actions being taken, we have concluded that the risk of slavery or human trafficking in our business or supply chain is extremely low.

### Our supply chain

With over 200 suppliers in our chain, many of whom have a global presence, we've enhanced our supply management framework to include modern slavery factors in due diligence processing and on-going relationship management monitoring. It's our practice to require suppliers to contractually confirm compliance with the Act, and where relevant, to evidence the steps they have taken to help in reducing the risk.

### Operations & recruitment

We've embedded internal policies and procedures to ensure that we conduct recruitment in an ethical and transparent manner. This requires that we check eligibility to work in the United Kingdom to safeguard human trafficking and that we pay in accordance with the UK living wage. To learn more, click [here](#).

We're committed to ensuring all employees – with emphasis on senior managers, procurement advisers and HR professionals – are provided with sufficient resources to allow them to identify signs of slavery and human trafficking, and how best to escalate concerns.

Our Whistleblowing Policy and dedicated telephone line enables all employees to raise concerns about how colleagues are being treated and report any risks of modern slavery without any fear of repercussions.

We shall continue to drive initiatives and enhance business controls against the risks of modern slavery with a zero-tolerance approach.



**Andy James, CEO**

First Central Insurance Management Ltd.