



# Wakam UK

# Modern Slavery

# Statement

September 2024

## Introduction

This statement sets out Wakam UK (WUK) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the year 1 August 2024 to 31 July 2025.

As part of the Financial Services Insurance sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational Structure

WUK is a UK Insurer who underwrites insurance products via its Partners to the end customer. WUK is incorporated in the UK and principally operates out of the UK. WUK operates from its office in London and is licenced to underwrite insurance in the UK.

## Supply Chains

WUK's supply chain includes Partners who sell our products and those supplying services to our UK office, which includes claims management. WUK does not manufacture or retail physical goods.

## Approach

WUK has a zero-tolerance approach to modern slavery in all forms. Our business operates in a reasonable manner with our employment practices held to the high standard we aim to uphold.

Our recruitment practice includes background screening on all employees including references and right to work status, as well as additional screening for material risk taskers which includes identity and financial history checks.

We all have a responsibility to be alert of the risks of modern slavery whether in our business or across our supply chain.

WUK employees are expected to comply with all laws and legislation and to always act with integrity and honesty. We review our policies and procedures regularly to ensure our employees have access to any additional information and support they may require about human trafficking, forced labour, servitude and slavery.

We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner. We also expect our suppliers to promote similar standards in their own supply chain.

## Controls

Controls for the organisation's modern slavery initiatives are as follows:

### Policies

These are developed by the Human Resources and Compliance department and reviewed on a regular basis to ensure they are fit for purpose and up to date with current legislation.

Policies at WUK include:

- Anti-bribery Policy
- Financial Crime Policy
- Equality, Diversity and Dignity at Work Policy
- Whistleblowing Policy

Ultimate prevention and adherence to the policies at WUK rests with the WUK Board, with the HR Department dealing with the day to day responsibility of implementing and monitoring policies, along with dealing with queries.

## **Risk assessments**

The Chief Risk Officer has broad UK organisational responsibility for human rights and modern slavery risk analysis, looking at processes/ ongoing reviews/ regular actions in this area to ensure WUK are compliant.

## **Investigations/due diligence**

This is carried out by Human Resources who investigate and respond in an appropriate way, which includes informing the relevant authority should any slavery or human trafficking be suspected. The Compliance department act as the second line of defence in ensuring investigations are carried out according to policy.

## **Training**

WUK employees are required to complete an e-learning course on Modern Slavery at onboarding to the organisation and a minimum of every two years following their start date. The course contains an e-learning element and questions with instant feedback to ensure they have understood the content.

This statement was approved by the Wakam UK Board.

Signé par :  
  
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Mark Christer  
UK Chief Executive Officer  
September 2024