



Modern Slavery and Human Trafficking Statement

Version	Date	Changes	By
1	20 th March 2019	New statement written	Jon Sprules
2	6 th May 2021	Update to effective financial years	Jon Sprules
3	27 th January 2022	Reviewed no changes	Jon Sprules
4	4 th January 2023	Update to effective financial years	Jon Sprules
5	8 th January 2024	Update to effective financial years	Jon Sprules
6	27 th January 2025	Reviewed and updated with contact details	Jon Sprules

“IBS is committed to conducting our business in a way that assists international efforts to counter Modern Slavery and Human Trafficking”

Nick Readings, CEO

For and on behalf of the Board of Directors



Modern Slavery and Human Trafficking statement as required under s54, Part 6, of the Modern Slavery Act [1] 2015 for the 2025/2026 financial year.

1. Introduction

Independent Broking Solutions Limited (IBS) and its Appointed Representatives (“the Company”) is committed to ensuring that its business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

The Company 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.

2. Organisation Structure

This statement covers the activities of Independent Broking Solutions Limited and its Appointed Representative Network.

3. Relevant Policies

The Company operates a number of policies that mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations.

4.1 Whistleblowing

The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact our Compliance Officer Jonathan Sprules in the full knowledge that all disclosures will be held confidential.

4.2 Supplier Chain Management

Whilst the Company exercises a vital role in the insurance distribution chain, it does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour. As a general rule, contractors and suppliers used by the Group are therefore not likely to be susceptible to this risk. However, we are mindful that others may not always uphold standards to the same level as Independent Broking Solutions Limited. Consequently, employees responsible for managing suppliers and others involved with the Group are, themselves, responsible for ensuring that our values and ideals are upheld. This continues to be a work in progress and we are strengthening our controls as new contracts are agreed. For example, serious violations by suppliers will lead to the termination of the business relationship.

4.3 Recruitment and Selection

The Company uses only, reputable employment agencies and personal contacts to source labour. All entities in the Group ensure appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports

The Company and its associated subsidiaries do not employ individuals that would be considered to be ‘child workers’. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all workers to enjoy, include:

- The right to a reasonable wage



- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

5. Right of Audit

All offices in the Group are subject to periodic audits. Core audit work includes an assessment of the basic working conditions of our staff and consideration of our ability to oversee controls discharged by third party suppliers.

6. Contact Details

If you suspect modern slavery, report it to the [Modern Slavery Helpline](#) on 08000 121 700 or the police on 101. In an emergency call 999, your information could save a life.

In addition, staff and external contacts can report any concerns in relation to potential modern slavery linked to the IBS' operations to Jonathan Sprules Compliance Director jonathan.sprules@isgrp.co.uk.

[1] References in this Statement to the "Act" are references to the "Modern Slavery Act 2015"