



The Acorn Group

Modern Slavery Act 2015 Annual Transparency Statement

For year ending: 31st December
2025

This statement by Acorn Group Services Limited (AGSL), part of the Acorn Group Limited (“the Group”), is made pursuant to section 54 (6) of the Modern Slavery Act 2015. It constitutes the Groups slavery and human trafficking statement in respect of the financial year ended 31st of December 2025 and was approved by the AGSL board, on behalf of the Group, on 28th April 2026.

1. Introduction

This statement has been published in accordance with the UK’s Modern Slavery Act 2015 (“MSA”). It sets out the steps taken during the year ending 31st December 2025 to prevent modern slavery and human trafficking in its business and supply chains.

The MSA requires commercial organisations with an annual turnover of more than £36 million to publish a slavery and trafficking statement for each financial year. We are committed to ensuring that no form of modern slavery takes place within our own operations or the supply chain. Modern slavery is defined as slavery, servitude, force or compulsory labour and human trafficking.

2. About Us

We provide specialist insurance, claims and IT development services. This statement covers the entities as listed below.

<p>Acorn Insurance & Financial Services Limited (“Acorn”) authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 311873). Trading/Brand Names: <i>Acorn Claims</i> <i>Acorn Insurance</i> <i>Acorn Insurance & Financial Services Ltd</i> <i>Acorn Insurance Group</i> <i>Acorn Protect</i> <i>Briefly</i> <i>Brieflycover</i> <i>Carrot Insurance Services</i> <i>Flag Insurance (Brokers)</i> <i>Granite Underwriting</i> <i>Haven Claims</i> <i>Ladies First</i> <i>Motorcade Insurance</i> <i>Pay how you drive</i> <i>Street Cover</i></p>	<p>Acorn is a specialist insurance intermediary, offering non-standard car, taxi, van, motor trade, legal expenses, breakdown, excess reimbursement and home insurance. Acorn also provides claims handling services for Haven Insurance.</p>
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<i>TaxiMaster Insurance</i> <i>My Policy</i> <i>JURNY</i>	
Granite Finance Ltd (“Granite Finance”) authorised and regulated by the Financial Conduct Authority (FCA) (FRN: 713766) Trading/Brand Names: <i>Granite Finance</i> <i>Granite Finance Ltd</i>	Granite Finance provides finance solutions for both personal and business customers to spread the cost of insurance over regular instalments.
My Policy Limited (“ My Policy ”) authorised and regulated by the Financial Conduct Authority (FCA) (FRN 307350) Trading/Brand Names: <i>Jurny</i> <i>My Policy</i> <i>My Policy Limited</i>	My Policy is an insurance intermediary offering a private car telematics product to encourage safe driving.
Minerva Services Limited	Minerva is an information technology/software development provider

3. Supply Chain

We recognise our responsibility to ensure our suppliers have fair and ethical labour practices. Our supply chain includes insurance brokers, insurers, comparison websites, vehicle replacement providers, repairers, counter fraud and intelligence providers, payment providers, cloud providers, software providers, and solicitors. We engage directly with around 350 suppliers that are largely registered in the UK but some have operations and supply chains across the globe.

Wherever possible we use our own assessment relating to modern slavery requirements but also ensure alignment with Government guidance on modern slavery requirements and policies.

4. Ongoing Management of suppliers

Under our supplier management framework we rate our suppliers on their relative importance. This segmentation is categorised into 4 tiers, we apply a risk-based approach that concentrates effort in managing the top 2 tiers (our key suppliers). We will continue to work with key suppliers to understand how they manage modern slavery risks.

5. Recruitment Practices

We are committed to fair recruitment and employment conditions. We recognise the right of each employee to freedom of association, including the right to join trade unions. We ensure that we comply with employment legislation and we do not employ people who do not have the right to work in the UK.

6. Governance

We have an Employee Handbook which incorporates a code of conduct and internal policies and procedures such as Anti-Bribery and Corruption and Financial Crime. In addition, we have a strong commitment to delivering a diverse, equal and inclusive working environment for our staff. We set out the ethical standards we expect our staff to comply with across our internal policies and all policies reaffirm our expectation that staff act with honesty and integrity whilst complying with legal and regulatory requirements at all times. To further enhance our internal controls to mitigate the risk of slavery, we have a Modern Slavery policy which reflects our commitment to:

- Act with integrity and ethically in all our business relationships,
- Ensure our Board, senior management and employees at all levels are aware of the principles of the MSA,
- Enforce effective due diligence processes and controls to ensure slavery and human trafficking is not taking place anywhere within our business or in our supply chains,
- Carry out risk assessments to understand the company’s exposure to the risk of modern slavery,

- Maintain fair recruitment procedures and conditions of employment, and;
- Encourage the reporting of any actions which may contravene the MSA.

7. Due Diligence

An outsourcing/third party provider policy is in place which governs; the proposal process, due diligence, contractual requirements, risk mitigation, and management of the supply chain.

We are dedicated to continuously improving our approach to preventing modern slavery and will look to enhance what we already do during 2026. We are currently actively sourcing a third-party risk management system to support this enhancement and where possible the obligations set out within our outsourcing/third party provider policy, a short list has been identified and work to finalise the procurement is underway.

When sourcing contracts, we require prospective suppliers to confirm whether they are a relevant organisation under section 54 of MSA 2015, and if so whether they are compliant with the annual reporting requirements in section 54.

Depending on the nature of the goods and services being procured we incorporate questions about modern slavery into our supplier selection process.

8. Risk Assessment

Due to the nature of our business, we consider the inherent risk of modern slavery and human trafficking occurring in our business to be low. Nonetheless we take our responsibility to identify and effectively respond to any incidents of modern slavery and human trafficking very seriously.

We have a risk management system in place which identifies, assesses, measures, monitors and manages risks the business is exposed to, or could potentially be exposed to. The risk of slavery within the operational framework and supply chain is documented in the risk register to ensure it is assessed and monitored on an ongoing basis.

9. Training

We recognise that educating our staff is fundamental to ensuring that potential risks to human rights and modern slavery are identified and managed in a timely and efficient manner. Our current training programme includes our Code of Conduct with specific focus on conducting business in accordance with the highest ethical standards, and empowering staff to report any improper activity.

In addition, we have a bespoke Modern Slavery learning module made available to all to ensure that staff understand the significance of the MSA and the importance of reducing the risk of modern slavery within the Group and the minimum standards required to comply. Our Learning and Development team always seek to ensure the design and delivery of training is engaging and provides links to further sources of material for more enhanced knowledge.

Board Approval

The Directors of the Acorn Group Services Limited approved this statement on the 28.04.2026

Nicola McLachlan

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Director