



# **Modern Slavery Policy**

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Brian Johnston & Co (Insurance Brokers) Ltd is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including subcontractors, and partners.

The Company upholds the spirit and intentions of the Modern Slavery Act 2015.

We will ensure transparency within the Company and suppliers of goods and the larger supply chain and services to the Company through steps which include:

- Assessing and reducing the risk in the business of modern slavery practices occurring e.g. checking the authenticity of papers proving a right to work in the UK;
- Having robust procurement policies that ensure our supply chain is scrutinised for compliance, and consequences of non-compliance are clear and actioned i.e. that commercial relationships with suppliers, contractors and other business partners will not be entered into (or terminated if existing);
- Providing information to staff on the warning signs that might indicate that modern slavery is taking place;
- Promoting to staff the importance of raising immediately any concerns they may have; and
- Protecting staff who are 'whistle blowers' in respect of concerns they have about modern slavery.

#### Introduction

This statement sets out Brain Johnston & Co (Insurance Brokers) Ltd's 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 Company's 2025 (01/01/2025 - 31/12/2025) financial period.

As a Financial Conduct Authority regulated firm, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely 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.

## **Company structure and supply chains**

This statement covers the activities of Brian Johnston & Co (Insurance Brokers) Ltd, which is a general insurance broker providing and administrating insurance policies including insurance claim management activities (via its sister-company Linkfield Accident Management Ltd).

#### Countries of operation and supply

The Company currently operates in the UK.

## **Relevant policies**

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy - 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
Company. 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.

## **Board approval**

This statement has been approved by the Company's Board of Directors, who will review and update it annually.