

Saturn.

GROUP

Modern Slavery Statement

Statement Owner	CEO
Version	V 3.0
Effective Date	October 2026

SATURN GROUP

MODERN SLAVERY STATEMENT

Introduction

This statement constitutes the slavery and human trafficking statement for the financial year ending 31 December 2025 for Saturn Holdings plc ("Saturn"), on behalf of itself and its subsidiary entities, Tradex Insurance Company plc ("Tradex"), Soteria Insurance Limited ("Soteria") and, from 1 July 2026, Markerstudy Insurance Services Limited ("MISL") (collectively referred to as the "Saturn Group").

Organisation structure

The Saturn Group operates within the UK insurance sector through a combination of regulated insurance undertakings and insurance services businesses. The Group's activities include the underwriting and administration of insurance products, claims management and the provision of related insurance services.

Policy in relation to slavery and human trafficking

The Saturn Group is committed to ensuring that slavery, servitude, forced labour, child exploitation and human trafficking will not be tolerated within our company or within our supply chain. The Saturn Group is committed to complying with the Modern Slavery Act 2015.

Additionally, Saturn Group has a Whistleblowing Policy, which actively encourages the reporting of unethical behaviour.

Due diligence processes

The Saturn Group utilises two principal channels for the supply of services to is:

1. Services provided by Markerstudy Group to Saturn Group, and supported by the Markerstudy Group's supply chain; and
2. Direct supply arrangements between Saturn Group and its supply chain.

The risks associated with these channels vary according to the factors including the nature of the services provided, the location of operations and the complexity of the relevant supply chain.

Where services are provided by Markerstudy Group, we predominantly rely on its policies, due diligence process and monitoring to ensure its contracting process includes specific prohibitions against the use of slavery, servitude, forced labour, child exploitation and human trafficking. In turn, Markerstudy Group expects that its suppliers will hold their own suppliers to the same high standards.

As part of the Saturn Group's supplier management activities, we take a risk-based and proportionate approach to preventing modern slavery. We request information from our suppliers including (where appropriate) their Modern Slavery Statement; Anti-Slavery Policy; disclosure of locations of any high-risk operations; approach to pre-employment screening; contractual safeguards and details of any training carried out.

Colleagues

The Saturn Group employs over 950 employees across its entities, mostly in professional roles, who are subject to vetting and referencing before their employment commences, thus presenting low-to-no risk of modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking, we provide mandatory online Modern Slavery and Whistleblowing training to our employees.

Ownership and Accountability

Our Third-Party Supplier Management Team, supported by our Risk & Compliance Team, are responsible for our modern slavery risk management. The Saturn Group Executive Management Team and Board are ultimately responsible for ensuring that the Saturn Group complies with the Modern Slavery Act 2015.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2025. It was approved by the board on 2 October 2026.



Mark Summerfield
CEO, Saturn Group