

ASCOT GROUP ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This anti-slavery statement is made on behalf of Ascot Group Limited and its affiliates (“Ascot Group”), including subsidiaries operating in the UK and owned or controlled by Ascot Group companies¹, in compliance with s.54(1) of the Modern Slavery Act 2015 (“the Act”). This statement outlines the steps that Ascot Group has taken to ensure that slavery and human trafficking are not taking place in its supply chains or any part of its business.

ORGANISATIONAL STRUCTURE

Ascot Group operates internationally, including via Syndicate 1414 at Lloyd’s (the “Syndicate”). Ascot Underwriting Limited is the Managing Agent of the Syndicate and provides insurance and reinsurance services out of its offices in London.

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Ascot Group has a zero-tolerance approach to slavery and human trafficking and is dedicated to ensuring that slavery and human trafficking do not take place in any part of our business or supply chains.

Ascot Group is proud to offer all of its employees market-related pay and benefits. Ascot Group operates a whistleblowing policy which encourages employees to report any suspected illegal or unethical activities or behaviour.

SUPPLY CHAIN AND SUPPLIER DUE DILIGENCE

As a specialist provider of (re)insurance services, part of our supply chain involves business produced from other regulated entities, such as (re)insurance brokers. Such services are not normally associated with slavery or forced labour. Similarly, the companies in Ascot Group’s broader supply chains are reputable entities that are subject in most cases to high levels of regulation and/or public scrutiny. Ascot Group’s relationships with these companies are governed by comprehensive contractual terms. Regular audits are conducted to monitor compliance with these terms.

Ascot Group, in its various guises, is subject to a number of regulatory regimes in different jurisdictions globally as well as the governance of Lloyd’s. These regimes require transparency and encourage the adoption of fair working conditions for employees and ethical outsourcing procedures.

Ascot Group monitors and controls risk within its business through the operation of a number of policies and procedures relating to, among others, bribery and corruption, conflicts of interest, money laundering and financial crime, and whistle-blowing.

TRAINING

All appropriate Ascot Group employees complete a training module on how to recognise and act on knowledge or suspicion of modern slavery as part of their mandatory annual compliance training.

¹ As at the date of this statement Ascot Group’s UK subsidiaries are: Ascot Insurance Holdings Limited, Ascot Underwriting Group Limited, Ascot Employees Corporate Member Limited, Ascot Underwriting Holdings Limited, Ascot Corporate Name Limited, Ascot Underwriting Limited and Ascot Insurance Services Limited.

In addition, all appropriate employees of Ascot Group have been encouraged to visit modernslavery.co.uk to enhance their overall understanding of this global issue. This will ensure a high level of understanding of the risks of slavery and human trafficking in supply chains and the business in general.

EFFECTIVENESS

Ascot Group will continue to adopt these principles across all contracts and procurement processes across the supply chain. By setting out a clear stance, and by raising employees' awareness of modern slavery, Ascot Group mitigates against the risk of slavery and human trafficking within the context of its limited supply chain.

CONTINUING COMMITMENT

This statement will be reviewed and updated as appropriate and at least on an annual basis. We will also undertake to: (i) identify key risk areas in our supply chains and strengthen our governance and controls, where appropriate; (ii) work collaboratively with our supply chain to promote Ascot's zero-tolerance approach to slavery and human trafficking; and (iii) continue to safeguard whistleblowers.

In doing so, we will:

- Incorporate Modern Slavery Act clauses (or appropriate alternative wording) in relevant contracts;
- Undertake a slavery and human trafficking risk assessment of a sample of suppliers;
- Incorporate specific references to the Modern Slavery Act in relevant Ascot Group policies; and
- Continue to address concerns around modern slavery and human trafficking as and when they arise in the procurement process.

APPLICATION

This Ascot Group Anti-Slavery and Human Trafficking Statement is made in compliance with the Act and is directly applicable as of the date of signature.



Andrew Brooks
Chief Executive Officer
Ascot Group Limited

Approved by the Board of Ascot Group Limited at its meeting on 4 June 2019