



MS AMLIN CORPORATE SERVICES LIMITED

MODERN SLAVERY ACT STATEMENT 2020

This Statement¹ has been published in accordance with the Modern Slavery Act 2015 (the “Act”) and relates to the financial year 2020. It outlines the steps that MS Amlin has taken and is taking to prevent modern slavery and human trafficking as defined in Appendix A of the Government’s 2017 Guidance² issued under s. 54(9) of the Act and includes activities undertaken during the course of 2020 to address the risks of potential slavery in MS Amlin’s supply chains or in its business operations. MS Amlin will be adding this Modern Slavery Act statement to the UK Government’s new online modern slavery statement registry which follows a commitment from the UK Government to strengthen the reporting requirements under s.54 of the Act following its Transparency in Supply Chains Consultation.

MS Amlin’s business and governance structure

MS Amlin provides insurance in property and casualty, marine and reinsurance for other insurers and is part of the global insurance group, MS & AD Insurance Group Holdings. We are committed to the highest principles of personal and professional conduct and our governance structure is designed to ensure that these principles are clear to every individual who works within MS Amlin. MS Amlin is committed to treating all its employees with dignity and respect and protecting their human rights and security in the workplace. MS Amlin has in place policies and standards to ensure that all employees are treated fairly and any concerns are investigated thoroughly.

How we address modern slavery at MS Amlin

Our policies

Given the nature of MS Amlin’s business in a highly regulated, financial services environment and the risk assessments MS Amlin has undertaken, MS Amlin believes that its business is not high risk in terms of modern slavery and human trafficking. However, MS Amlin remains fully committed to addressing the risks of modern slavery in its own operations and supply chain.

MS Amlin has a Code of Conduct (the “Code”) which it expects all its material suppliers to sign up to. This Code sets out our values as a business and our expectations of behaviour and includes an explicit obligation to comply with the Act, including requiring suppliers to ensure that others in their supply chain adhere to our ethical values and practices. The Code also provides signposts to spot the signs of modern slavery and expressly refers to the fact that any suspicion or concern of any violations of the Code may be reported to MS Amlin’s independent whistle-blowing hotline which provides a way for MS Amlin’s employees and those who work for MS Amlin’s suppliers to raise concerns and to make disclosures without fear of detrimental treatment. There were no issues which related to modern slavery or human trafficking raised through the whistle-blowing hotline in 2020.

Contracting with suppliers

MS Amlin works with reputable suppliers and conducts comprehensive and proportionate due diligence checks in relation to them. Every supplier who is engaged on MS Amlin’s standard terms of contract is required to confirm that all work or services conducted or products supplied to MS Amlin are in accordance with all applicable laws, regulations, governmental requirements and industry guidelines. Also included in MS Amlin’s standard terms are obligations to agree with our policies, including the Code, the right to

¹ This statement sets out the steps taken by MS Amlin Corporate Services Limited, MS Amlin Underwriting Limited and MS Amlin Corporate Member Limited (“MS Amlin”), all of which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

² Transparency in Supply Chains etc. A practical guide. Guidance issued under section 54(9) of the Modern Slavery Act 2015 and updated in April 2020.

inspection and audit rights, which consist of pre-announced visits to supplier's premises and follow up audits to ascertain whether the cause of any non-compliance has been remedied.

We acknowledge that there is always more to be done particularly in relation to mapping supply chains several tiers down but we have to balance this against the challenges this presents and our ability to influence those entities further down the chain to undertake additional due diligence at the request of a customer several steps removed and where our purchasing power may be small. However, we will continue to address these challenges and report transparently where we find them and engage in working collaboratively with our suppliers in order to bring greater influence to bear if we discover any areas of concern in our supply chain.

Managing risks of slavery and human trafficking

We acknowledge that there may be areas within our business where the risks of modern slavery and human trafficking may be higher, if not properly managed. For instance, we have identified that support staff within our facilities operations, i.e. the outsourcing of office cleaning, security and maintenance services are most vulnerable to poor labour practices and also, within our supply chain. Where we have identified higher risk areas, we have put in place steps to mitigate those risks. Using the example of our facilities team, we ensure that time sheets are maintained for all support staff so that we may ensure that they do not work excessively long hours.

Effectiveness in ensuring that modern slavery and human trafficking is not taking place in the business or supply chains

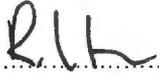
MS Amlin is targeted in how it selects and engages with its suppliers and in this regard, we have continued to assess our supply contracts by size and risk profile as part of our existing procurement processes and to consider the risk of modern slavery or trafficking being present. Due to the nature of MS Amlin's business and our existing robust recruitment, vetting and hiring processes and our straightforward supply chains, we continue to believe that there is a very low risk of slavery, servitude, forced or compulsory labour or human trafficking in any part of our business or our supply chains. We will work with suppliers that are concerned about their own workforce, the quality of their services and their impact on their environment as we consider that they make the best long term business partners. As noted above, prior to engaging with any strategic business partner, a due diligence process is undertaken to ensure that our key suppliers share our values.

Whistleblowing and Speak Up policy within MS Amlin

We acknowledge that 2020 was a challenging and unprecedented year and the COVID -19 pandemic has brought challenges that may increase the risk of modern slavery in supply chains. During 2020, MS Amlin's main focus was on the health and well-being of its employees as most of MS Amlin's employees in the UK have been working from home since March 2020 in accordance with government guidance. Nevertheless, we still needed some services such as security and maintenance to be provided in our offices during this period. We therefore required all our UK suppliers whose staff attended at MS Amlin's offices since March 2020 to confirm that any attendance was voluntary and that appropriate personal protective equipment (PPE) was provided to all staff who attended. All have confirmed this to be the case and we have also sought confirmation that all PPE provided was responsibly sourced. During 2020 MS Amlin has prioritised engagement with its service providers particularly in relation to its facilities operations to ensure that any financial impact on office support staff was mitigated, as far as possible, particularly given fluctuations in demand and changes in our suppliers' operating model. MS Amlin's Whistleblowing and Speak Up policy is well publicised within the MS Amlin organisation and includes procedures pursuant to which anyone within MS Amlin who has concerns about modern slavery or human trafficking in or relating to MS Amlin or any of its supply chain partners should report their concerns, without fear of reprisal or detrimental treatment because they have reported their concerns. This reporting procedure assists MS Amlin in monitoring and reviewing the risk areas identified and ensures that MS Amlin continues to develop appropriate and proportionate risk management systems to counter any form of slavery, servitude, forced or compulsory labour or human trafficking in our supply chain. It is our intention during 2021 to ensure that the emphasis on modern slavery risks continues to be in the forefront of all key business colleagues so that their understanding and awareness of the risks of modern slavery and human trafficking are increased. We believe that this focus will build the capacity of our colleagues to understand and manage

modern slavery risks within the business which will in turn, serve to improve monitoring and ensure that any issues arising are reported effectively.

This Statement was approved on behalf of MS Amlin by the Board of MS Amlin Corporate Services Limited on 15 June 2021 and signed on its behalf by Rob Houghton, Director, MS Amlin Corporate Services Limited.


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Rob Houghton

Date..... 16/6/2021