



MS AMLIN plc

MODERN SLAVERY ACT STATEMENT 2018

This Statement¹ has been published in accordance with the Modern Slavery Act 2015 (the "Act") and relates to the financial year 2018. 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 2018 to address the risks of potential slavery in MS Amlin's supply chains or in its business operations.

MS Amlin's business and governance structure

MS Amlin provides insurance in property and casualty, marine and aviation 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.

How we address modern slavery at MS Amlin

Our policies

Although MS Amlin is a highly regulated, financial services business and its business is not high risk in terms of modern slavery and human trafficking, we are committed to addressing the risks of modern slavery in our own operations and supply chain.

MS Amlin has a Code of Conduct (the "Code") which it expects all its suppliers to sign up to. This Code sets out our values as a business and our expectations of behaviour from our customers, suppliers, business associates and employees 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 2018.

Contracting with suppliers

MS Amlin's standard terms of contract requires that all work or services conducted or products supplied to MS Amlin is 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 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 we could do more particularly in relation to mapping supply chains several tiers down but we have to balance this against the time it takes to undertake this mapping exercise and reluctance from entities further down the chain to undertake additional due diligence at the request of a

¹ This statement sets out the steps taken by MS Amlin plc, MS Amlin Corporate Services Limited, MS Amlin Underwriting Limited, MS Amlin Corporate Member Limited, MS Amlin Insurance SE and MSI Corporate Capital Limited, 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
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

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 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

As we have a better understanding of where the risks lie in relation to modern slavery and human trafficking, our focus has shifted towards putting training into place to address risks in our supply chain, as noted below. We continue to 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.

Modern Slavery Act training and capacity building within MS Amlin

Since our last Modern Slavery Statement, we have decided that focussing on training will raise awareness so that modern slavery risks may be better understood and therefore, mitigated. In 2018, members of our Legal and Procurement teams attended an external training session in order to build their capacity to recognise indicators of modern slavery. It is our intention during 2019 to ensure that this training is rolled out to other parts of the business in order to increase understanding and awareness of the risks of modern slavery and human trafficking. We believe that this training 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, remediation and ensure that any grievances are reported effectively.

This Statement was approved by the Board of MS Amlin plc on 13 March 2019 and signed on its behalf by Simon Beale, Group Chief Executive, MS Amlin plc



Simon Beale

Date... 13th March 2019