

## **STATEMENT UNDER THE MODERN SLAVERY ACT 2015 for the year ended 31<sup>st</sup> December 2018**

Approved by the Board on 11 April 2019.

### **Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our statement, on behalf of our relevant UK entities and other group companies that carry on business in the UK, for the year ended 31<sup>st</sup> December 2018.

It is our assessment that, because of the business in which we are engaged and the nature of our supply chains, the risk of our organisation becoming involved in the support or encouragement of slavery or human trafficking is very small, and we remain committed to ensuring that this does not occur.

### **Organisation Structure**

Sompo International in the UK is a direct provider of insurance and reinsurance primarily through three of our entities - Endurance Worldwide Insurance Limited (EWIL) and Endurance at Lloyd's Limited (EAL), both of which are incorporated in England and Wales, and SI Insurance (Europe), SA (SIIE), which is a Luxembourgish company operating through a branch in the UK. EWIL, EAL and SIIE provide insurance and reinsurance across a range of classes of business in the UK and elsewhere in the world. Sompo International also operates a number of other companies in the UK. One of these companies, Endurance Business Services Limited (EBSL), provides a range of services to EWIL and EAL, including employing the staff who work for both EWIL and EAL and contracting with third parties who provided services to us. Another of these companies, on whose behalf this statement is given, is Endurance Corporate Capital Limited.

We are part of the wider Sompo Holdings group of companies, the ultimate parent of which is Sompo Holdings, Inc. headquartered in Japan and traded on the Tokyo Stock Exchange.

### **Our Modern Slavery Act 2015 Policy**

Our Modern Slavery Act 2015 Policy (the "Policy") sets out our approach to addressing the risks of Slavery and Human Trafficking (as defined in the Act) and ensuring such activity is not taking place in our supply chains or in any part of our business. This Policy is supported in a manner such that a framework exists so our staff must act in compliance with all laws and regulations and that they behave ethically and with integrity. Furthermore our policies specify that we expect the same high standards from those parties with whom we engage.

### **Our Supply Chains**

When considering our supply chains we focus on those firms that we pay for the provision of goods and services, including some insurance intermediary firms when they are acting as our agent.

However, where we provide insurance/reinsurance to a client who has come to us through a broker, who derives their income from the client, we do not consider those brokers to be a part of our supply chain. Additionally we do not consider that those to whom we provide insurance are part of our supply chain and consequently their activities are not subject to the same due diligence that is applied to those who form part of our supply chains.

#### **Due Diligence**

Where we engage third parties to supply goods and services to our businesses or where they act on our behalf we are clear that we expect them to comply with all applicable laws and regulations (including the Act). As part of our due diligence processes we seek to obtain assurances as to our suppliers' approach to tackling Slavery and Human Trafficking. We take a risk based approach to managing the risks we face of Slavery and Human Trafficking; we will apply this approach to our supplier due diligence.

#### **Training**

In addition to making our staff aware of the approach set out in our Policy, we also intend to provide training to relevant staff to ensure they understand the risks of Slavery and Human Trafficking in our supply chains. Additional, more focused training will be provided to relevant members of staff if required.

#### **Review**

This statement will be reviewed annually and updated as necessary.

**Signed:**



**Graham Evans**  
**Chief Executive Officer**

**Dated:** 17.4.2019.