



# Modern Slavery Policy



## Ownership

This policy is owned by the board of Endurance Worldwide Insurance Limited (“EWIL” or the “Company”), who will have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

It is also relevant to the following other entities:

- Endurance Business Services limited (“EBSL”);
- Endurance Worldwide Holdings Limited (“EWHL”);
- Endurance Holdings Limited (“EHL”);
- Sompo International Holdings (Europe) Limited (“SIHEL”); and
- The UK branch of SI Insurance (Europe), SA (“SIIE”)

Version	Date of Approval	Amended by	Reason
1.0	May 2018		
2.0	June 2024	R Dunn	Updated version

## **1. Introduction**

- 1.1 Modern slavery is a crime and a violation of fundamental human rights under the European Convention on Human Rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 The Company is committed to the principles of the Modern Slavery Act 2015 (the "Act") and the abolition of modern slavery and human trafficking. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains. We expect the same high standards from those parties with whom we contract.
- 1.3 As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.
- 1.4 Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.
- 1.5 We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## **2. Aims**

- 2.1 The purpose of this policy is to set out the steps the Company is taking to ensure that Slavery and Human Trafficking (as defined in the Act) is not taking place in our supply chains or in any part of our business.
- 2.2 For the purposes of this policy, "suppliers" shall mean "upstream suppliers" i.e. those firms that Sompo pays for the provision of goods and services, including some insurance intermediary firms when they are acting as Sompo's agent.

## **3. Our approach**

- 3.1 The Company aims to work to the highest professional standards and comply with all laws and regulations applicable to its business. The Company expects the same high standards from those parties with whom we engage, and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chain.
- 3.2 The Act requires commercial organizations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organization has taken to ensure that slavery and human trafficking is not taking place in its supply chain or its business. The Company's statement is published on the home page of its website and should be read in conjunction with this Policy.
- 3.3 The Company works to embed throughout its operations a robust risk management framework to ensure it effectively analyses and manages the risks to the business. As part of this, the Company will conduct due diligence on modern slavery within its supply chain by engaging with suppliers using a questionnaire (please see Annex I) to understand their

policies and practices related to modern slavery; and help to identify risks by considering the geographic location, industry and other relevant factors of the supplier.

- 3.4 The Company has established a Vendor Management Policy with which we expect our suppliers to comply. The Company may impose contractual obligations that require them to comply with the Vendor Management Policy, this Policy and to provide information of their own efforts to combat modern slavery.
- 3.5 Every individual working for the Company bears the responsibility to understand and adhere to this Policy, identify risks, and actively work to prevent and report any instances of modern slavery. The Company will provide the necessary training, support and resources to facilitate compliance.

#### **4. Training**

- 4.1 The Company aims to raise awareness of the Act by providing employees and management with training on a range of compliance matters, including their obligations and responsibilities under the Act.
- 4.2 The Company aims to ensure that all employees who have responsibility for procurement within our firm have appropriate knowledge in order to identify issues related to slavery and human trafficking, and review standard terms with suppliers as a means of ensuring disclosure and compliance.
- 4.3 Training will be an ongoing process, and we will encourage employees and suppliers to raise concerns. More comprehensive Training Modules are being developed to educate employees and suppliers about the signs of modern slavery, their legal obligations, and the reporting mechanisms in place.

#### **5. Whistleblowing**

The Company is committed to providing a safe and confidential mechanism for employees, suppliers, and other stakeholders to report concerns related to modern slavery. Reports can be made through designated reporting channels such as reporting to the legal or compliance function or making an anonymous report via Converscent (as set out in more detail in the Whistleblowing Policy), and the Company will investigate and take appropriate action on any reports.

#### **6. Communication**

This Policy will be communicated to all employee, suppliers and stakeholders.

Awareness of the risks the Company faces from modern slavery in its supply chain forms part of the induction process for individuals who work in higher risk roles such as those in procurement functions.

The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers at the outset of the business relationship with them and reinforced as appropriate thereafter.

## **7. Review**

This policy will be reviewed annually and updated as necessary to ensure it remains effective in preventing modern slavery within the Company and its supply chain and, if necessary, updated to reflect changes in the regulatory environment and emerging best practice.

The Company is committed to implementing and upholding this Policy to the best of its abilities, with the aim of eradicating modern slavery from its operations and supply chain.

**Annex I**
**Supplier Modern Slavery Act Questionnaire**
**Sompo UK**

Contact Details	
Company Name	
Company Address	
Responder Name	
Responder Job Title	
Phone Number	
Email Address	
Date Modern Slavery Act Questionnaire Completed	

Modern Slavery Act Questionnaire		
1.	<p>What are the business activities of your company and the nature of the relevant services to be provided?</p> <p>For financial or advisory services that are not high risk, please answer only questions 3 to 6. Financial and advisory services are high risk if they provide services from any of the locations listed in Appendix I</p>	Please explain.
2.	Does your company make use of any sub-contractors / suppliers in providing the relevant services?	Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, please complete 2(a) and 2(b), if No, please go to question 3.
	(a) Are any of the sub-contractors and/or suppliers located in any of the jurisdictions referenced in Appendix I?	Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, please specify which.

	(b) Does your company conduct its own supply chain due diligence, particularly in relation to the risks of modern slavery/forced labour?	Yes <input type="checkbox"/>
		No <input type="checkbox"/>
3.	Has your company been/or is currently a party to any governmental, regulatory, legal or arbitration proceedings, disputes or investigations (including pending or threatened of which the company is aware) involving allegations of breach of ethics and/or human rights violations (including modern slavery violations)?	Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, please give details.
4.	Does your company have an ethics policy in place and a zero-tolerance approach to having modern slavery in its business and supply chains?	Yes <input type="checkbox"/> No <input type="checkbox"/>
5.	If legally required, <sup>1</sup> please confirm your company has published a modern slavery statement and provide a copy.	Yes <input type="checkbox"/> No <input type="checkbox"/> Not required <input type="checkbox"/>
6.	Is there any other information your company can usefully provide as assurance that it takes a zero-tolerance approach to modern slavery in its business and supply chains?	Yes <input type="checkbox"/> No <input type="checkbox"/> Please explain.

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<sup>1</sup> Companies, wherever incorporated, must publish a modern slavery statement if they supply goods or services and they and their subsidiaries (wherever incorporated) have together a global turnover of over £36m and the company carries on a business, or part of a business, in the UK.

**Appendix I - High Risk Vendor Locations**

Afghanistan	Indonesia	Paraguay
Bangladesh	Iran	Peru
Bolivia	Kenya	Philippines
Brazil	Liberia	Russia
Cambodia	Libya	South Sudan
China	Malaysia	Türkiye
Colombia	Myanmar	Uganda
Democratic Republic of Congo	Nepal	Venezuela
Ecuador	Nicaragua	Vietnam
Eritrea	Nigeria	Zambia
Guatemala	North Korea	
India	Pakistan	