

## **FIDELIS ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **SLAVERY AND HUMAN TRAFFICKING POLICY**

The Fidelis Group has a zero tolerance to slavery and human trafficking and is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. The financial year ending 31 December 2016 represented Fidelis' first full year of operation as a start-up. We are now investigating what steps we can take as an individual company and more broadly as part of the insurance market to combat slavery in certain insured markets such as cargo, marine and construction.

### **ORGANISATION'S STRUCTURE**

Fidelis Insurance Holdings Limited is the holding company of the Fidelis Group which provides insurance and reinsurance services on a global basis. The companies within the Fidelis Group are either regulated insurance and/or reinsurance companies or service companies or serve a purpose ancillary to its principal insurance and/or reinsurance activities. Fidelis Insurance Holdings Limited has its registered office in Bermuda. There are approximately 70 employees across the Fidelis Group which operates in both Bermuda and the UK.

### **OUR SUPPLY CHAINS**

The Fidelis Group is a provider of insurance and reinsurance services and the Fidelis Group engages with brokers on a global basis. The Boards of the Fidelis Group companies consider that the risk of it or its supply chains being involved in or complicit in slavery or human trafficking is very low due to the nature of the services. The Fidelis Group is not involved in the activities of producing or manufacturing goods which typically involve supply chains which can be susceptible to this risk. There is a risk, however, that whilst not being within its supply chains in the everyday sense, insurers can become involved and thereby complicit, by virtue of their insurance of supply chains or development projects, which could involve slavery or human trafficking.

The Fidelis Group procures services in areas including catering, cleaning, IT support, IT software development, investment management and actuarial consultancy. All employees are contractually required to behave in a professional manner and not bring the company into disrepute; this is inclusive of the approach to engaging suppliers. Additionally, employees are required to uphold the Fidelis Group's ethos which acts as a set of guiding principles in how to conduct business activities.

### **OUR POLICIES**

The Slavery and Human Trafficking Policy is the principal articulation of the Fidelis Group's policy on slavery and human trafficking and is intended to inform and influence all the operational procedures within the Fidelis Group. In order to identify and mitigate potential risk areas, including risk of slavery and human trafficking in our supply chains, we operate a range of policies and procedures, including the following:

- Whistleblowing Policy
- Anti-Bribery and Corruption Policy

- Anti-Money Laundering Policy
- Outsourcing Procedure

Our Compliance function provides regular training on the above policies and procedures to all staff and new joiners. The Group Compliance Officer monitors compliance with these policies, which is reinforced by the Internal Audit function.

## **RECRUITMENT**

Whilst reputable employment agencies are engaged to source candidates, the Fidelis Group's Human Resources function carry out checks to ensure that employees have the right to work and are protected by relevant employment legislation.

We also expect all our staff to enjoy the following basic rights:

- The right to a reasonable wage;
- The right to a safe working environment;
- The right to an appropriate level of holiday and cover for a period of sickness;
- The freedom to complain directly via our internal Grievance Procedure free of charge if they believe that they are not being treated fairly; and
- The freedom to report any other concerns via our Whistleblowing Policy free of charge, if they have any other concerns.

## **TRAINING**

To ensure an understanding of the risks of modern slavery and human trafficking in supply chains, we conduct annual compliance training for all staff, both in London and Bermuda. Our staff have also been provided with a copy of this statement to raise awareness.

## **EFFECTIVENESS**

The Fidelis Group is adopting its Slavery and Human Trafficking Policy across all contracts and procurement processes across the supply chain. By stating its clear policy and by ensuring its staff's awareness of modern slavery, the Fidelis Group will be able to effectively mitigate against the risk of slavery and human trafficking within the context of its limited supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Fidelis Group's slavery and human trafficking statement for the financial year ending 31 December 2016.

Richard Brindle, Group Chief Executive Officer

Date: 20 February 2017