

# Anti-slavery and human trafficking statement

This Anti-Slavery and Human Trafficking Statement (the “**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 2018.

## 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 100 employees across the Fidelis Group which operates in Bermuda, Republic of Ireland and the UK.

## OUR COMMITMENT

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.

This Statement contains the Fidelis Group’s vision and commitment to be a responsible organisation in the insurance industry to combat slavery and human trafficking. We have devised a robust operational procedure to ensure that our values and ethics are integrated into operation to prevent slavery and human trafficking. We provide more detail on these steps below.

## ANTI-SLAVERY CHARTER

In 2018, Fidelis has become the first financial services company to sign up to the Anti-Slavery Charter.

The Anti-Slavery Charter sets out basic measures that states, NGOs, businesses and societies must take to end slavery across the globe. As a business committed to preventing slavery and human trafficking, Fidelis pledges to using our power to empower those vulnerable to slavery, to advance emancipation, and to promote access to decent work.

As part of our commitment to the Anti-Slavery Charter, the Fidelis Group has established a robust due diligence process to ensure that the recruitment agencies we work with are adhering to the basic standards of human rights protections.

Detail of the Anti-Slavery Charter can be found here:

<https://www.antislavery.org/anti-slavery-charter/>

## TRAINING

To ensure an understanding of the risks of modern slavery and human trafficking in supply chains, we have conducted compulsory compliance training for all staff, both in London and Bermuda, in respect of modern

slavery and the Fidelis Group's Anti-Slavery and Human Trafficking statement for the year ending 31 December 2018. Annual training will be provided in respect of each annual statement. In 2019, we will continue this training to all staff in our London and Bermuda office, as well as our Dublin office established in late 2018. All staff have also been provided with a copy of this statement to raise awareness.

## **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.

In order to mitigate the risk of inadvertently supporting slavery in insured supply chains, the Fidelis Group is driving an initiative, in cooperation with a number of London market brokers and underwriters, to produce a model clause in marine cargo insurance contracts making the payment of insurance claims conditional upon insureds meeting their obligations under the US Trade Facilitation and Trade Enforcement Act of 2015 (or other applicable equivalent national legislations). This therefore incentivises potential insureds to avoid supporting trade in goods produced by slave, forced or child labour. The Fidelis Group also mitigates the risk of insuring development or construction projects which could involve slavery or human trafficking by its standard underwriting process which requires its underwriters to be satisfied that the highest social and environmental standards are upheld before it underwrites such risk. If the underwriter is not satisfied that these standards are met, he/she will not underwrite the risk.

The Fidelis Group procures services in areas including catering, cleaning, IT support, IT software development, investment management and actuarial consultancy. We have taken steps to confirm with the property manager for our UK premises, from whom we procure cleaning and other building services, their procedures for mitigating the risk of slavery and human trafficking in their supply chains, and are satisfied with their compliance. The managing company of our Bermuda premises has confirmed that while it is not subject to the Modern Slavery Act 2015, its policies reflect the same philosophy and standards in relation to its staff and the procurement of services. The managing company of our Dublin office has also confirmed that they are compliant with the applicable anti-slavery and human trafficking laws. We have taken steps to include a clause into our material service contracts to ensure that compliance with anti-slavery and human trafficking law is embedded in our relationships, beginning with our actuarial consultancy and IT software development services contracts, to raise awareness and to oblige our service providers to ensure there is no slavery or human trafficking in their businesses or supply chains. We shall continue this work in 2019 and extend implementation of this clause to all our supplier contracts, to ensure our service providers are compliant in all respects.

All employees continue to be 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**

This Statement 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.

## **EFFECTIVENESS**

By stating its clear policy in this Statement and by ensuring its staff's awareness of modern slavery as a result of the training described above, the Fidelis Group is able to effectively mitigate against the risk of slavery and human trafficking within the context of its limited supply chain. In addition to staff awareness when engaging suppliers, the adoption of the Fidelis Group's Anti-Slavery and Human Trafficking policy in its material service contracts is effective in placing a contractual obligation on Fidelis' counterparties. The effectiveness of the steps to introduce a clause to marine cargo insurance contracts making payment of claims conditional upon insureds meeting their obligations under the existing Trade legislations, whilst not yet implemented, shall be actively monitored.

Richard Brindle, Group Chief Executive Officer

Date: 19 February 2019