



Modern Slavery and Human Trafficking Statement

Introduction

This Statement sets out Tokio Marine HCC's actions in the UK to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is zero tolerance to human trafficking in its own businesses and supply chains. The Company recognises that it has a responsibility to take a robust approach to combatting slavery and human trafficking. The Company is absolutely 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.

Definition

The Modern Slavery Act will give law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for crimes committed and enhance support and protection for victims. It received Royal Assent on Thursday 26 March 2015.

Scope

This Statement applies to HCC International Insurance Company PLC (HCCII), including its regional and overseas branches, HCC Underwriting Agency Ltd. (HCCUA), including Syndicate 4141 and the associated service companies, Houston Casualty Company – London Branch (HCL) (collectively referred to as 'the Company') and their supply chains.

In addition, this Statement will apply to all staff working for the service company and to staff employed by Group-owned underwriting agencies where the agent has delegated authority from one or more of the trading platforms as noted above.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The HR and Compliance departments are responsible for putting in place and reviewing this statement. The CSR Committee must review this policy and approval is required by the Board.
- **Investigations/due diligence:** The Compliance Department is responsible for investigations in relation to known or suspected instances of slavery and human trafficking. The Compliance Department will also request information regarding commitment to anti-slavery and human trafficking as part of all due diligence exercises.
- **Training:** All employees will be issued with on-line training on modern slavery and human trafficking and TM HCC anti-slavery initiatives.



Relevant policies

The Company operates the following policies that help in the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The Company encourages its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees or others who have concerns should refer to the company's Whistleblowing Policy which can be found on the company's intranet or from the Compliance Department. The policy outlines in full the different options available to employees wishing to report any concerns, including the internal reporting procedure.

If employees or others feel uncomfortable contacting anyone from within the Company then these options are also available:

- 1) The Chairman of the Audit Committee appointed as Tokio Marine HCC's Whistleblowing Champion. cscarr@tmhcc.com.
- 2) Free, confidential advice can be found from the whistleblowing charity, Public Concern at Work www.pcaaw.org.uk
- 3) Confidential Whistleblowing Hotline (National Hotline Service): The following toll free AT&T USADirect® Access Numbers may be used for the hotline when calling from:
 - Ireland: 1-800-550-000
 - United Kingdom: 0-800-89-0011

Please note that when you call the toll free numbers listed above you will be asked to dial the number required which will be the National Hotline Number of 0800 826 6762.

- **Code of Business Conduct & Ethics:** The Company's Code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour.
- **Recruitment:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Preferred Supplier agreements will request evidence that the recruitment agency has its own Modern Slavery and Human Trafficking Statement.



- **Any other policies / touch points:**
 - Outsourcing Policy & Procedures
 - Recruitment Policy
 - Preferred Supplier Terms and Conditions
 - Agency workers regulations
 - Employee Handbook

Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Requesting suppliers set out their commitment to preventing modern slavery and human trafficking within their own business and their supply chains.
- In those instances where suppliers do not have adequate procedures for managing modern slavery and human trafficking, the relevant 3rd party may not be approved for use. Should a failing arise during the course of a contract Executive Management will be so advised and all options will be considered including the possibility of terminating the arrangement.

Performance indicators

In light of the introduction of the Modern Slavery Act 2015, the Company:

- requires all staff to complete training on modern slavery;
- is reviewing its existing and renewal supply chains; and
- all new contracts must continue to be reviewed by the Compliance Department.

Board approval

This statement was approved by the Company's Boards of Directors on 02/02/2017, which will review and update it annually.