



Modern Slavery Statement

Hamilton Insurance Group, Ltd. is a Bermuda-headquartered company that underwrites speciality insurance and reinsurance risks on a global basis through its operating subsidiaries Hamilton Re, Ltd, in Bermuda, Hamilton Insurance DAC in Ireland, Hamilton Managing Agency Ltd in the United Kingdom and Hamilton Managing General Agency Americas LLC in the United States.

This document constitutes the 2020 modern slavery and human trafficking statement for Hamilton Insurance Group, Ltd. and its subsidiary companies (together, “Hamilton”).

This statement demonstrates Hamilton’s ongoing commitment to mitigating the risk of slavery and human trafficking within its organisation and wider supply chains.

Hamilton’s Approach

Hamilton is committed to its efforts to comply with relevant modern slavery laws and, in doing so, endorses the implementation and promotion of ethical business practices to protect workers, both within its organisation and its supply chain, from being abused and exploited.

As a regulated financial services business, Hamilton does not operate in an industry where slavery and human trafficking is prevalent. As such, Hamilton have assessed the risk of becoming involved in supporting or encouraging modern slavery and human trafficking, unwittingly or otherwise, as very low.

Hamilton has adopted a Modern Slavery Prevention Policy which states:

Hamilton has a zero-tolerance approach to all forms of slavery and is committed to ensuring our practices combat slavery and human trafficking within our business and supply chains by taking all reasonable steps necessary. We recognise our collective responsibility to be alert to the risks, however small, in our business and the wider supply chain.

Recruitment Process

As an employer, Hamilton respects international human rights standards and promotes fair reward and recognition, diversity, inclusion and equal opportunity in all employee dealings, including decisions on hiring, remuneration, training and promotion.

Hamilton has a comprehensive recruitment process to ensure compliance with relevant employment law; this includes reference and identification checks for new joiners.



Training and Development

On an annual basis, Hamilton staff are reminded of their obligations to identify and report suspicions of modern slavery.

Furthermore, Hamilton requires all new employees upon joining the business to complete compliance induction training, which brings awareness to the issues surrounding modern slavery.

This training intends to equip employees with the skills to recognise signs of slavery and human trafficking and report it.

The overarching objective is to prevent slavery and human trafficking from occurring within Hamilton or its supply chain.

Hamilton's Policies

A suite of internal policies, including a Code of Conduct and Ethics, covers all aspects of Hamilton's conduct and sets the moral compass for the operation of its business. Hamilton's policies promote consistently high business and ethical standards, designed to support its employees and other stakeholders, and ensure business partners and suppliers operate to equivalent standards.

- **Code of Conduct and Ethics** - Hamilton employees must comply with and annually certify their compliance to the Code of Conduct and Ethics. Employees are encouraged to report violations of the Code, including any unethical, inappropriate, or negligent conduct. Retaliation against employees who report actual or potential violations is strictly prohibited.
- **Whistleblowing** - Hamilton operates an independent whistleblowing helpline to allow employees to report concerns, including those relating to slavery and human trafficking. Employees are required to familiarise themselves with the whistleblowing policy to ensure they understand how to identify and report their concerns.
- **Procurement** - Hamilton continues to review and refine its procurement process to ensure a consistent approach to tackling modern slavery and human trafficking, including due diligence and a risk-based assessment of Hamilton's suppliers to define appropriate levels of oversight throughout the contract life cycle.
- **Outsourcing** - Hamilton operates an outsourcing policy that governs the delegation of claims handling and underwriting authority. The due diligence processes will include an analysis of the risk of inadvertently working with third parties who do not demonstrate a commitment to the prevention of slavery and human trafficking.

In articulating clear policies and embedding preventative controls within business processes, Hamilton can continue to monitor and mitigate the risks of slavery and human trafficking within its supply chain.

Hamilton continues to review its processes and controls to ensure they are operating effectively and proportionate to the risks faced in its supply chain. A suite of key performance indicators is under development to enable Hamilton's executive management team to track and review the effectiveness of the policies to pre-vent slavery and human trafficking.



Hamilton's Supply Chain

Hamilton underwrites a book of worldwide commercial insurance and reinsurance. All business is produced by brokers, with a significant proportion of business originating in territories assessed by the Global Slavery Index as representing low risk. Some functions necessary to run its business effectively, such as payroll, IT, facilities and some activities related to underwriting and claims, are outsourced to professional services firms, locally and abroad.

Hamilton is committed to partnering with only those service suppliers who share common values and a commitment to combat slavery and human trafficking. As such, Hamilton has implemented systems and controls that assist in monitoring slavery and human trafficking within its supply chain.

Given the nature of Hamilton's business, contractors and suppliers used by Hamilton are less likely to be susceptible to the risk of slavery and human trafficking. However, Hamilton remains mindful that others may not uphold the same standards. Hamilton takes steps to validate that such values are maintained through appropriate due diligence and conducting a risk-based assessment of its third-party administrators, delegated underwriting authorities and re/insurance intermediaries. In addition, Hamilton's service contracts with third parties contain general provisions requiring compliance with applicable laws and regulations. Where a risk assessment on a third party suggests a higher risk of slavery and trafficking, additional controls may be considered.

Annual Statement

There were no identified cases or reports of modern slavery or violation of human rights within Hamilton or within the supply chain.



Approval

This statement has been approved and signed on behalf of Hamilton.

Robert Vetch

Director, Hamilton UK Holdings Ltd.
30 June 2021

Gemma Carreiro

General Counsel, Hamilton Insurance Group, Ltd.
30 June 2021

The above statement is made pursuant to the obligations arising under section 54(1) of the United Kingdom Modern Slavery Act 2015 and sets out the steps taken by Hamilton's United Kingdom domiciled subsidiaries during the financial year ended 31 December 2020 to combat slavery and human trafficking in Hamilton's business. Hamilton UK Holdings Ltd (registered company number 09241836), the immediate holding company of:

Hamilton Managing Agency Ltd (registered company number 05832065), a Lloyd's managing agency.

Hamilton Underwriting Ltd (registered company number 06684157), a Lloyd's managing agency.

Hamilton Corporate Member Ltd (registered company number 05996460), a Lloyd's corporate member supporting the underwriting of syndicates managed by Hamilton Managing Agency Ltd.

Ironshore CC (Three) Ltd (registered company number 07041930), a Lloyd's corporate member supporting the underwriting of syndicates managed by Hamilton Managing Agency Ltd.

Hamilton UK Services Ltd (registered company number 11381012), a group services company that provides resources to Hamilton Managing Agency Ltd.