



## UK Legislation

# Modern Slavery Statement

The Modern Slavery Act 2015 is a piece of UK legislation that requires certain commercial organisations, including the UK operations of Hamilton Insurance Group\*, to publish a slavery and human trafficking statement for each financial year. The statement set out below is made pursuant to the obligations arising under section 54(1) of the Act and sets out the steps taken during the financial year ended 31 December 2019 to combat slavery and human trafficking in our business.

The business of Hamilton's UK operations is the management of Lloyd's syndicates 1947, 2014, 3334, 4000 and 6125 in the underwriting of worldwide insurance and reinsurance at Lloyd's, operating from offices in London, United Kingdom. All business is produced by Lloyd's approved brokers or international brokers, with a large proportion of business emanating from territories assessed by the Global Slavery Index as presenting a low risk of modern slavery. Some ancillary services relating to underwriting and claims activities are outsourced to professional firms. Others in our supply chain include providers of services necessary to run our business effectively, such as IT, payroll, and facilities. We do not act as a producer, manufacturer or retailer of physical goods, and have no supply chains relating to such activities. More information on our business can be found at [hamiltongroup.com](https://www.hamiltongroup.com). Given this background, the relevant Boards and management believe Hamilton does not operate in an industry where modern slavery is prevalent and have assessed the risk of becoming involved in the support or encouragement of slavery, unwittingly or otherwise, as very small. Nevertheless, Hamilton is committed to partnering with only those service suppliers who share common values and we monitor potential risks within the supply chain.

Hamilton is committed to compliance with all applicable laws. A suite of principles and a Code of Conduct & Ethics set the moral compass of the way we work. A raft of internal policies, procedures and processes cover all aspects of the business to ensure outcomes of business practice achieve consistently high business and ethical standards. These cover human resource, outsourcing and key procurement processes which are designed to support our employees and ensure business partners and suppliers operate to equivalent standards.

All employees agree an employment contract at the outset of their engagement with Hamilton. The benefits and rights available to employees, together with an explanation of their own responsibilities, are set out in an Employee Handbook available from the company intranet. Employees are required to comply with, and annually certify their compliance to, our Code of Conduct and Ethics. Our employee benefits are benchmarked to aid understanding that employees are appropriately rewarded for their work.



Hamilton recognises that success is defined by how we shoulder our responsibilities and treat each other. Employees are encouraged to report violations of the Code of Conduct and Ethics, laws, regulations, legal obligations or internal policies, or of unethical, inappropriate or negligent conduct or concealment of any of these. Whistleblowing processes are in place to allow employees to freely report concerns that they have. A dedicated human resources function addresses any concerns raised by employees and provides advice on all matters related to their employment.

Hamilton's UK operations have adopted a Modern Slavery Prevention Policy which sets out:

***Hamilton has a zero-tolerance approach to all forms of slavery and is committed to ensuring our practices combat modern slavery within our business and in our 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 in the wider supply chain.***

Certain of the firms covered by this statement were acquired by Hamilton Insurance Group in August 2019. Processes therefore differed throughout 2019, though were similar in that a risk-based assessment of service suppliers' measures to prevent modern slavery operated throughout the year. We seek to include contractual

provisions within contracts with service suppliers as those contracts are entered in to or are renewed. The executive management team review a suite of key performance indicators to track the effectiveness of the procedures established to prevent modern slavery. To date, Hamilton's UK operations have received no reports of, nor otherwise identified instances of, modern slavery in its business model.

A programme of training has been rolled out to promote awareness and understanding amongst employees of the risks of modern slavery and human trafficking in our business and within supply chains.

In articulating a clear Policy, by raising our employees' awareness of modern slavery and through embedding preventative controls within business processes, Hamilton will be able to effectively mitigate the risks of modern slavery within its limited supply chain.

**Robert Vetch, Director**

16 June, 2020

\*Hamilton Managing Agency Ltd<sup>^</sup> (registered company number 05832065) and Hamilton Underwriting Ltd (registered company number 06684157) were the primary trading entities of the Hamilton Insurance Group companies operating in the United Kingdom in 2019. This statement additionally applies to Hamilton Corporate Member Ltd (registered company number 05996460), a Lloyd's corporate member supporting syndicate 3334 during 2019, Ironshore CC (Three) Ltd<sup>^</sup> (registered company number 07041930), a Lloyd's corporate member supporting syndicate 4000 during 2019, Hamilton UK Services Ltd (registered company number 11381012), a group service company that provides resources to Hamilton Managing Agency and Hamilton Underwriting Ltd, and Hamilton UK Holdings Ltd (registered company number 09241836), the immediate holding company of Hamilton Managing Agency Ltd, Hamilton Underwriting Ltd, Hamilton Corporate Member Ltd, Ironshore CC (Three) Ltd and Hamilton UK Services Ltd.

<sup>^</sup>Hamilton Managing Agency Ltd and Ironshore CC (Three) Ltd were acquired by Hamilton Insurance Group in August 2019.