



▶ SLAVERY AND HUMAN TRAFFICKING STATEMENT

We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in relation to all of our business activities.

Given the nature of our business, our Board and management teams consider that there is minimal risk that, either within the Shipowners' Club or the very limited supply chains which support our business activities, there are any processes in which we could be seen to support or be complicit in slavery and human trafficking.

Our business

As market leaders in our field, we insure over 32,000 small and specialist vessels, entered through a global distribution network of over 700 brokers. We offer peace of mind to vessel owners, operators and managers through our Protection & Indemnity (P&I) cover and various associated insurances that cover key seafaring industries.

We have been protecting small and specialist vessel operators for over 160 years. We pride ourselves on having profound knowledge of ships and shipping internationally within our sector that is second to none.

We are also a member of the International Group of P&I Clubs, which represents over 90% of the world's ocean-going tonnage and provides a voice for vessel owners' views on legislation, conventions and regulations that impact on their operations.

We operate from offices in London, Luxembourg, Singapore and Hong Kong and have approximately 160 employees worldwide.

Our supply chains

As an insurance provider, our supply chain is limited to two key areas:

- (i) providers of business services including office facilities such as cleaning and technical support services for such things as air conditioning, IT, telephones and communications infrastructure; and
- (ii) providers of professional industry related services including brokers, surveyors, lawyers, local shipping correspondents and other marine investigators

We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

Where we operate as a purchaser of goods or services we expect a high level of ethical conduct from those businesses with which we do business.

To date we haven't been made aware of any human trafficking / slavery activities within our supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

Our Due diligence processes

As part of our initiative to identify and mitigate the risk of engaging in modern slavery and human trafficking we have in place systems to:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Our policies on slavery and human trafficking

The employment and procurement practices operated within the Group ensure that we are viewed as an excellent and supportive employer. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and we are proud of the conditions of employment for all employees throughout the Shipowners' Club.

Our Anti-Slavery statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The rights and responsibilities of all employees and third parties acting on our behalf are set out in various Club policies, contracts of employment, and in the competency and behaviour section of our intranet.

All employees have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Our Training

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business all employees have been made aware of this statement and reminders will be issued on an annual basis.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending December 2020.

A handwritten signature in black ink, appearing to read "Simon J. ...", with a horizontal line underneath it.

11 February 2020