This statement is published in accordance with the UK’s Modern Slavery Act 2015 ("the Act"). It sets out the steps taken by Aspen Insurance UK Limited and other relevant group companies [1] ("the Group” or “Aspen”) to ensure that slavery and human trafficking do not exist in our business or supply chains.

Policies

We have prepared and implemented an amendment to our Code of Business Conduct and Ethics ("the Code"), applicable to all employees in the Group, to state that Aspen takes a zero tolerance approach to slavery and human trafficking and is committed to ensuring that there is no slavery or human trafficking in our business or supply chains. This is reflective of the Code’s general commitment to integrity in the conduct of our business and the requirement that all Aspen employees perform their duties in a manner, which is legally, ethically and morally irreproachable.

Other relevant policies, including our Outsourcing Policy and Procurement Policy, have also been reviewed and amended to highlight the need to consider slavery and human trafficking issues when selecting and engaging with suppliers.

We have a Whistleblowing Policy under which employees can report any issues or concerns they may have regarding slavery or human trafficking in our business or supply chains.

Employment

Our recruitment processes comply with UK employment legislation, and we ensure that ‘right to work’ document checks and contracts of employment are in place for both permanent and temporary employees.

In 2018 we outsourced recruitment to a third party. Our agreement with this third party has full modern slavery provisions and the third party in turn has robust policies and procedures in place to counter slavery and human trafficking.

Engagement with suppliers

We have reviewed our spend data to assess the number of suppliers, their location and the nature of the goods or services being provided, in order to assess which suppliers represent the greatest risk to managing slavery and human trafficking in our supply chain. For those higher risk suppliers, we have reviewed their policies and statements to ascertain that they are ensuring compliance with the requirements of the Act.

Our tender template includes a statement that Aspen is committed to ensuring slavery and human trafficking do not exist in our business or supply chains. Bidding suppliers are required to include their relevant policies and procedures as part of their tenders.

Our standard purchasing terms require that a supplier must comply with the provisions of the Act in relation both to its direct employees and to its suppliers and ensure that neither it nor its supply chain makes use of slavery, forced or bonded labour or human trafficking.
In 2018 we signed global outsourcing agreements with two Indian-based suppliers for the provision of a range of back and middle office services, including IT. The evaluation of the suppliers included a full assessment of their approach to modern slavery, as well as their ethical and social policies. This included a review of the organisations’ United Nations report based on the Global Reporting Initiative, covering the organisations’ approach to issues such as human rights practice, ethical supply chains and operating ethically. The agreements with the suppliers contain a range of clauses to prevent and detect modern slavery, for example, clauses covering the Act, minimum wage obligations and extensive audit rights. We undertook several site visits to the organisations’ delivery locations during the selection process and these visits have continued after signing of the agreements.

**Awareness and training**

All Aspen employees have been made aware of the Act, the changes to our policies and the commitments these represent. More in-depth training has been given to our Procurement team and to key spending departments.

**Approval of this statement**

This statement is made pursuant to Section 54 (1) of the Act and constitutes the Group’s slavery and human trafficking statement for the financial year-end 2018. This statement was approved by the Boards of Aspen Insurance UK Limited, Aspen Managing Agency Limited, Aspen Insurance UK Services Limited, Aspen UK Syndicate Services Limited and Aspen Risk Management Limited.

Mike Cain

CEO, Aspen Insurance UK Limited

June 2019