Lockton Companies LLP and Omnyy LLP are authorised and regulated by the Financial Conduct Authority. You can check their details by visiting the FCA Register at https://register.fca.org.uk/ Lockton's Firm Registration Number [FRN] is 523069. Omnyy's FRN is 541369.

Anti-Slavery Statement

Lockton International Holdings Ltd - Anti-Slavery Statement June 2016

Slavery is an abhorrent practice and Lockton is committed to ensuring that it is absent from Lockton's own business and supply chains globally.

Statement of Risk Appetite

Lockton has a zero tolerance of slavery in all its forms. This means that Lockton has no appetite for causing harm to persons, damaging its reputation, being subject of legal action or incurring financial loss or standing in the business community arising from a failure to comply with the Law set out in the Modern Slavery Act. Lockton's policies, controls and procedures are designed to reduce risk to this level.

Application and Scope of this statement

This statement applies to all companies in the Lockton International Group ("Lockton"), including all majority and minority interests wholly or partly. For the avoidance of doubt, it includes Lockton Companies LLP. Unless noted, all companies in Lockton are required to abide by this policy.

How Lockton Combats Slavery

In order to combat slavery, Lockton

- Will adopt this policy and approve this statement;
- Has performed a risk assessment to identify areas where the risk of slavery may be elevated. This assessment will be performed annually and the outputs and actions will be reviewed by the Board of Lockton International Holdings Ltd. Lockton considers itself to be at "Low" risk of slavery arising (meaning that it is unlikely or known that slavery is not occurring), but is not compliant and as a result of the risk assessment has identified sensible, risk-based measures designed to reduce risk to within stated appetite. Slavery is specifically referenced in Lockton's Whistleblowing policy. Other actions have been identified to ensure that persons employed by Lockton have a formal contract of employment to reduce risk of forced labour occurring. Businesses in the Lockton group will be required to attest to compliance annually, failure to act in accordance with this policy may result in disciplinary action being taken;
- Has implemented and identified further checks in its supply chain (principally those involved in providing and distributing products to Lockton customers) to reduce the risk of slavery occurring; in particular, Lockton uses screening software to identify suppliers and other third parties who may have had convictions for (and allegations of) trafficking and similar offences. Further actions have been identified that will, when implemented, require participants in the supply chain to attest to an absence of non-compliant activity, to sign agreements that require compliant behaviours, and to submit to checks and monitor failures to Lockton;
- Will investigate the provision of training materials for all Associates in the group and disseminate information on the requirements of this policy once approved, and;
- Will formally review performance against this policy annually.

Lockton welcomes questions from interested persons on this subject.

Signed and approved on behalf of the Lockton International Holdings Board:

Name: [Signature]

Date: 22/3/16
AWARDS & AFFILIATIONS

LOCKTON BLOGS
- Lockton Cyber Risk Update
- Lockton Benefits
- Lockton Market Update

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