Our Modern Slavery Statement

Our purpose and scope of this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps Ageas (UK) Limited and its subsidiaries have taken towards ensuring that there is no slavery or human trafficking in their business or supply chains.

This statement relates to the financial year 1 January 2018 to 31 December 2018, and to the activities of Ageas (UK) Limited, Ageas Insurance Limited, Ageas Retail Limited and Tesco Underwriting Limited (together, “Ageas UK”).

This statement was approved by the Board of Ageas (UK) Limited on 10 May 2019.

Our business

Ageas UK provides non-life insurance products to around five million customers within the UK. Ageas UK is part of the Ageas Group (“Ageas”), which is headquartered in Belgium and which operates in countries across Europe and Asia, providing life and non-life insurance solutions to retail and business customers.

Our approach to human rights

Respect for human rights is one of the principles which Ageas applies in all countries in which it is active. Ageas’ Principles of Business Conduct, which are set out in its Corporate Governance Charter state that: “We are of the opinion that respect for human rights, as described in the Universal Declaration of Human Rights of the United Nations of 1948, is a condition for maintaining a sustainable society. We apply the relevant human rights principles in our relationships with employees and we acknowledge our responsibility for promoting the application of human rights whenever we, as a private enterprise, are in a position to make a meaningful contribution to this cause”.

People in our business

All Ageas UK staff are based in the UK, and the majority are engaged in the development, sale and administration of insurance products. Ageas UK does not therefore consider there to be a high risk that the people within its business are the victims of modern slavery or human trafficking. Nevertheless, Ageas UK has policies in place that are intended to ensure that they are not.

During 2018 Ageas UK had procedures in place for ensuring that only individuals with the right to work in the UK were employed in its business. These procedures are set out in the Employee Vetting Policy which is reviewed annually. During the recruitment process, identity and right to work documentation are obtained in accordance with Home Office guidelines. Where staff are engaged on a temporary basis using recruitment agencies, the agencies are required to undertake appropriate right to work and reference checks on Ageas UK’s behalf, and Ageas UK obtains evidence that these checks have been carried out.

Suppliers to our business

Ageas UK uses a wide variety of suppliers. Like most large businesses it engages with suppliers of facilities management services, such as catering and cleaning providers. As an insurer it also engages with suppliers of goods and repair services when customers’ property has been lost or damaged, and medical and assistance services when customers have suffered accident or injury. Ageas UK recognises that there is a risk that modern slavery and human trafficking may occur in supply chains of this nature.
During 2018 Ageas UK had procedures in place to ensure that there is oversight over the selection and management of all third party suppliers. These procedures cover the due diligence process, contractual requirements, and ongoing relationship management. During the course of 2018 Ageas UK continued its programme of regular due diligence reviews conducted on existing suppliers, which included asking suppliers for information in relation to the steps they have taken to address modern slavery risks.

During 2018 Ageas UK also included clauses in new contracts with suppliers requiring them to at all times maintain and implement policies designed to ensure that there is no modern slavery in their business or supply chains.

**Training and awareness**

During 2018 Ageas UK published information on its internal communications platform drawing employees’ attention to the importance of ensuring that there is no modern slavery in Ageas UK’s supply chains and requesting that staff raise any concerns that they have.

**Whistleblowing**

During 2018 Ageas UK had procedures in place to enable employees to raise concerns about wrongful behaviour within its business, including in relation to ethical standards, without fear of reprisal. These procedures are set out in the Whistleblowing Policy which is reviewed at least annually. Ensuring the independence, autonomy and effectiveness of the whistleblowing procedures in place, including those for the protection of staff raising concerns, is the responsibility of the Chair of the Audit Committee.

**Ensuring ongoing compliance**

Ageas UK has procedures in place to ensure ongoing compliance with the policies referenced in this statement. Adherence to the policies and applicable legislation and guidance is monitored by Ageas UK’s Compliance department.

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Andy Watson  
CEO, Ageas (UK) Limited  
10 May 2019