Modern Slavery and human trafficking statement for financial year ending 30 September 2018


The Group

Hyperion Insurance Group Limited (the “Company”/“Hyperion”) is registered in England and Wales under company registration number 2937398. Registered office: One Creechurch Place, London, EC3A 5AF.

The Company has a number of subsidiaries including DUAL International Limited, Howden Broking Group Limited, RKH Group Limited, Hyperion X Limited and Hyperion Services Limited (together, the “Group”).

Our Approach

The Group is committed to ensuring that its business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

The Group is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Organisation structure & supply chain due diligence

This statement covers the activities of the Group which is headquartered in London and has 4,700 employees in entities across the world.

Supply chain management

Whilst the Group exercises a vital role in the insurance distribution chain, it does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour.

As a general rule, contractors and suppliers used by the Group are therefore not likely to be susceptible to this risk. However, we are mindful that others may not always uphold standards to the same level as the Group. Consequently, employees responsible for managing suppliers and others involved with the Group are, themselves, responsible for ensuring that our values and ideals are upheld. This continues to be a work in progress and we are strengthening our controls as new contracts are agreed. For example, serious violations by suppliers will lead to the termination of the business relationship.

The Group continues to review its supply chain in line with identifiable risks and ensure this information is shared within the Group. The Group is also in the process of creating global procurement principles which will be shared as a recommendation across the Group.

Relevant Policies

The Group operates a number of policies that mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations.
Whistleblowing

The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Group’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, clients and customers or others who have concerns can use our confidential helpline.

Recruitment and Selection

The Group uses only specified, reputable employment agencies to source labour. All entities in the Group ensure appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

The Group does not employ individuals that would be considered to be ‘child workers’. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all workers to enjoy, include:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

Right of Audit

All offices in the Group are subject to periodic audits. Core audit work includes an assessment of the basic working conditions of our staff and consideration of our ability to oversee controls discharged by third party suppliers.

Training

Key individuals dealing with significant procurement on behalf of the Group attend relevant modern slavery training.

Our modern slavery and human trafficking statement for the financial year ending 2018, has been sent to the Board for approval, as reflected by the Group CEO’s signature below.

David Howden