Anti-Slavery and Human Trafficking Statement

INTRODUCTION

This statement is made on behalf of Barbican Holdings (UK) Limited ("BHUK"), and Barbican Corporate Member Limited ("BCML"), a wholly owned subsidiary of BHUK. Unless stated otherwise this statement applies to BHUK, BCML and each other subsidiary and entity otherwise owner or controlled by BHUK (together "Barbican"). It sets out the actions taken by Barbican to understand all potential modern slavery risks related to its business and to put in place measures aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains.

ORGANISATIONAL STRUCTURE

For the purposes of this Statement, Barbican comprises two distinct operating divisions:

- Barbican Managing Agency Limited, which manages insurance and reinsurance business at Lloyd’s.
- Barbican Intermediaries, which comprises the intermediary businesses: Barbican Protect Limited, Barbican Underwriting Limited, Castel Underwriting Agencies Limited and Seacurus Limited.

Barbican 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.

BARBICAN’S SUPPLY CHAIN

Barbican’s supply chain comprises suppliers that provide a range of goods and services such as, but not exclusive of, cleaning services, IT vendors, claims handling and accountancy, auditing and other professional services. Barbican is committed to ensuring that its business partners observe high professional standards. Barbican requires that its suppliers commit, contractually, to observing best practice when it comes to anti-slavery and human trafficking compliance.

POLICIES

Barbican operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** - Barbican encourages all its employees, 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 organisation’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee code of conduct** - Barbican’s code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour which also extends to operating abroad and managing its supply chain.

- **Recruitment policy** - Barbican uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. By setting out clear policies, and by raising employees’ awareness of modern slavery, Barbican will be able to effectively mitigate the risk of slavery and human trafficking within its supply chain.
DUE DILIGENCE

Barbican undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- conducting annual supplier audits through Barbican’s own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;

PERFORMANCE INDICATORS

Barbican has reviewed its key performance indicators (KPIs) and as a result, is:

- requiring all staff to have completed Modern Slavery Act awareness training by 30 April 2019; and
- creating an annual risk profile for each supplier by the end of 2019.

TRAINING

Mandatory annual awareness training is given to all Barbican employees in order to engender a good level of understanding of the risks of slavery and human trafficking in supply chains and the business in general.

Barbican is committed to monitoring the effectiveness of the mandatory training. Barbican will continue to review its policies and processes to ensure that Barbican and Barbican’s suppliers continue to comply with the Modern Slavery Act 2015.

APPLICATION

This Anti-Slavery and Human Trafficking Statement is made in compliance with s.54(1) of the Modern Slavery Act 2015. This statement is for the 2018 financial year ending on 31 December 2018.

David Reeves
Group Chief Executive Officer
April 2019

Download the Anti-Slavery and Human Trafficking Statement 2019

Previous statements

- Anti-Slavery and Human Trafficking Statement 2018
- Anti-Slavery and Human Trafficking Statement 2017