22 March 2019

Slavery and human trafficking statement

Introduction and scope

This statement is made on behalf of AEGIS Managing Agency Limited and its affiliated companies in the UK, being its parent company, AEGIS London Holdings Limited (ALHL) and all of ALHL’s UK-domiciled subsidiaries (collectively, “AEGIS London”), in accordance with s.54(1) of the Modern Slavery Act 2015. The full list of companies to which the statement applies is listed in the Addendum below. The statement provides an overview of the steps that AEGIS London carries out to ensure that slavery and human trafficking is not taking place in its supply chains or any part of its business.

This version of the statement is directly applicable to AEGIS London’s 2018 year of account and shall also constitute AEGIS London’s statement for all subsequent years of account until such time as it is modified, renewed, or removed from the AEGIS London website.

AEGIS London’s structure

AEGIS London’s companies are subsidiaries of AEGIS, a mutual insurance company domiciled in Bermuda. AEGIS London’s
principal operating subsidiary, AEGIS Managing Agency Limited, is the managing agent of Syndicate 1225 at Lloyd’s. Other companies in AEGIS London’s UK operations exist to support Syndicate 1225’s insurance business at Lloyd’s. AEGIS London operates principally out of its head office in London, however, as part of the Lloyd’s market Syndicate 1225 provides insurance and reinsurance products in for (re)insureds in various jurisdictions.

**Business and supply chains**

AEGIS London’s business is the carrying out of insurance and reinsurance contracts at Lloyd’s. Accordingly, the supply chains involved in the production of such business are extremely limited and the majority of these involve business production from other regulated entities, such as UK insurance and reinsurance brokers. Producers wishing to do business with AEGIS London are required to enter into written terms of business agreements which outline the responsibilities of each party in relation to the provision of (re)insurance. AEGIS London’s professional support services are predominantly supplied by established professional service companies, where we consider there to be a low risk of involvement in slavery or human trafficking. AEGIS London does not act as a producer or manufacturer or distributor of tangible physical goods and, as such, has no supply chains regarding any such activities.

**Policy Statement**

AEGIS London does not tolerate slavery and human trafficking in its business or its supply chains. AEGIS London has put in place and maintains appropriate systems and controls to ensure (inter alia) that slavery and human trafficking is not taking place anywhere in its business or supply chains. AEGIS London operates a whistleblowing policy which encourages staff to report any suspected illegal or unethical activities or behaviour. This policy statement memorializes AEGIS London’s position on slavery and human trafficking and it shall inform all of the applicable procedures and operational practices within AEGIS London.

**Due Diligence in relation to slavery and human trafficking**

AEGIS London has in place systems and controls to conduct due diligence on producers of business and on potential outsourcing partners. The regulated nature of the business we carry out requires that AEGIS London monitors and controls risk within its
operations through a variety of policies and procedures, including but not limited to bribery and corruption, money laundering and financial crime, sanctions compliance, conflicts of interest, and whistleblowing. AEGIS London has, when commensurate with the apparent risk, drawn the attention of relevant suppliers and service providers to the Act and has, where applicable, obtained appropriate assurance from each that they are in compliance with the requirements.

Risk assessment and mitigation

Given the nature of AEGIS London’s business, the board and senior management is of the view that there is a low risk that AEGIS London is supportive of or complicit in any form of slavery and human trafficking in relation to the company’s business or in its limited supply chains. AEGIS London considers its policies and procedures to be proportionate to the mitigation of such risks.

Training

This statement will be issued to all AEGIS London staff as a summary of AEGIS London’s position and framework in relation to slavery and human trafficking. Where it is required additional advice will be given to relevant members of staff by the Human Resources Function and/or the Compliance Function.

David Croom-Johnson
Managing Director

Addendum: companies included within the scope of this statement

1. AEGIS Managing Agency Limited (03413859)
2. AEGIS London Holdings Limited (07984021)
3. AEGIS Electric & Gas International Services Limited (03200519)
4. AEGIS Electric & Gas International Services 2 Limited (07807959)
5. AEGIS Electric & Gas International Services 3 Limited
6. AEGIS Electric & Gas International Services 4 Limited (09810024)

7. AEGIS Electric & Gas International Services 5 Limited (09810040)

8. AEGIS London Services Limited (06872527)