ASCOT GROUP ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This anti-slavery statement is made on behalf of Ascot Group Limited and its affiliates ("Ascot Group"), including subsidiaries operating in the UK and owned or controlled by Ascot Group companies, in compliance with s.54(1) of the Modern Slavery Act 2015, and outlines the steps that Ascot Group has taken to ensure that slavery and human trafficking are not taking place in its supply chains or any part of its business.

ORGANISATIONAL STRUCTURE

Ascot Group operates internationally, including via Syndicate 1414 at Lloyd’s (the “Syndicate”). Ascot Underwriting Limited is the Managing Agent of the Syndicate and provides insurance and reinsurance services out of its offices in London.

SLAVERY AND HUMAN TRAFFICKING POLICY

Ascot Group has a zero-tolerance approach to slavery and human trafficking and is dedicated to ensuring that slavery and human trafficking do not take place in any part of our business or supply chains.

Ascot Group is proud to offer all its employees market-related pay and benefits.

SUPPLY CHAIN AND SUPPLIER DUE DILIGENCE

The companies in Ascot Group’s supply chains are reputable entities that are subject in most cases to high levels of regulation and/or public scrutiny. Ascot Group’s relationships with these companies are governed by comprehensive contractual terms. Regular audits are conducted to monitor compliance with these terms.

Ascot Group, in its various guises, is subject to a number of regulatory regimes in different jurisdictions globally as well as the governance of Lloyd’s. These regimes require transparency and encourage the adoption of fair working conditions for employees and ethical outsourcing procedures.

Ascot Group monitors and controls risk within its business through the operation of a number of policies and procedures relating to, among others, bribery and corruption, conflicts of interest, financial crime, and whistle-blowing.

TRAINING

A new training module on how to recognise and act on knowledge or suspicion of modern slavery will be incorporated into the 2017/18 mandatory annual compliance training for all appropriate Ascot Group employees.

In addition, all appropriate employees of Ascot Group will be encouraged to visit modernslavery.co.uk to enhance their overall understanding of this global issue. This will ensure
a high level of understanding of the risks of slavery and human trafficking in supply chains and
the business in general.

EFFECTIVENESS

Ascot Group will look to adopt the Slavery and Human Trafficking Policy across all contracts
and procurement processes across the supply chain. By setting out a clear policy, and by raising
employees’ awareness of modern slavery, Ascot Group will be able to effectively mitigate
against the risk of slavery and human trafficking within the context of its limited supply chain.

APPLICATION

This Ascot Group Slavery and Human Trafficking Statement is made in compliance with s.54(1)
of the Modern Slavery Act 2015. This version is directly applicable as of the date of signature
and will constitute Ascot Group’s Slavery and Human Trafficking Statement until such time as it
is modified, renewed or removed from the Ascot Group website.

CONTINUING COMMITMENT

This Ascot Group Slavery and Human Trafficking Statement is made in compliance with s.54(1)
of the Modern Slavery Act 2015. This version is to up to date as of November 2017; however, its
objectives will be reviewed and updated as appropriate and at least on an annual basis.

Andrew Brooks

Director

Ascot Group Limited

Approved by the Board of Ascot Group Limited at its meeting on 5 December 2017

TERMS & CONDITIONS

COOKIE & PRIVACY POLICY

ANTI-SLAVERY STATEMENT

BOARD DIVERSITY POLICY

TAX STRATEGY (UK)

https://ascotgroup.com/anti-slavery-statement

Accessed on 23 Feb 2019