

# Thomas Miller Modern Slavery and Human Trafficking Statement

June 2019

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Thomas Miller's slavery and human trafficking statement for the financial year ending 31 December 2018 until it may in future be modified or amended. Such modifications or amendments will be communicated to all our existing and new employees. The statement has been approved by the Thomas Miller Holdings Board and will be communicated to all our suppliers to ensure they comply with our values and ethics.

## Introduction

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The term "modern slavery" encompasses offences such as slavery, servitude, forced or compulsory labour and human trafficking and, as such, is a violation of human rights. It involves behaviour on the part of the offender as if he/she "owned" a person, depriving the victim of his/her freedom (slavery); the use of coercion and the obligation for a "serf" to live on another person's property and the impossibility of changing his or her condition (servitude); direct or indirect threats of violence to exact work or service from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily (forced or compulsory labour); and the arrangement of facilitation of travel of another person with a view to that person being exploited (human trafficking).

## Modern Slavery Statement

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We have a zero tolerance approach to modern slavery and human trafficking and are also committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place in our own business nor in any business within the Group and the supply chains we operate. We always work to the highest professional standards and comply with all laws and regulations applicable to the business.

Thomas Miller is a global company and the nature of its business is such that the supply chains supporting our business are limited and there is minimal risk that we are in any way involved or complicit in modern slavery or human trafficking either in our own business or the businesses we manage or in the businesses of our suppliers. We are committed to improving our practices to combat modern slavery and human trafficking.

## Organisational Structure

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The parent company of the Group is Thomas Miller Holdings Ltd which is registered in Bermuda. Thomas Miller is an international provider of market leading insurance services. Most of the businesses we currently own or manage are acknowledged leaders in their chosen market. Our portfolio includes mutual organisations and, increasingly, specialist insurance services businesses.

## Our Supply Chains and Risk Assessment

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Neither Thomas Miller nor the businesses we own or manage are producers, manufacturers or retailers of goods and, as such, do not have supply chains involving the procurement of raw materials, factories,

assembly plants or migrant workers. Our supply chains are limited to the procurement of professional services, such as lawyers, surveyors, actuaries and other services to facilitate the insurance companies we manage. Their engagement and ongoing monitoring are the subjects of a Thomas Miller Procurement Policy for Professional Services.

The goods and suppliers of other services, such as cleaning, catering, property management and communications infrastructure that we procure to run our business are the subject of a separate Thomas Miller Procurement Policy for Goods and Services other than Professional Services.

## Our Policies

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We have reviewed our internal policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. We currently have no stand-alone policy on modern slavery and human trafficking. We do, however, have a well-developed risk culture based on good governance and the three lines of defence risk management model. We have developed a number of policies that reflect our approach to risk management and bear on the requirements to combat slavery and human trafficking and on our corporate social responsibility as it relates to the environment. Relevant policies for Thomas Miller and the businesses we own and manage are:

- Procurement Policy for Professional Services
- Procurement Policy for Goods and Services other than Professional Services
- Conduct Risk Policy
- Recruitment Policy
- Remuneration Policy
- Outsourcing Policy
- Risk Management Framework
- Whistleblowing Policy
- Employee Handbook

All policies and procedures are stored on our Electronic Quality Management System (EQMS) and are accessible by all staff.

## Our System and Controls - Due Diligence Processes, Measuring Effectiveness and Training

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We have dedicated Risk and Compliance functions led by the Group Risk and Compliance Director with involvement from the Human Resources department and Internal Audit function. The Thomas Miller and Club Boards receive reports from these function areas. We have in place general system and controls as follows,

- The selection and management of suppliers, including service evaluation and review, are governed by the procurement policies identified above.
- The Outsourcing Policy provides guidance on the assessment of options for outsourcing material activities to a third party which includes a detailed specification of the due diligence review performed on the chosen service provider and the requirement for a written agreement.
- Recruitment methods and standards for potential suppliers are also articulated in the procurement policies.
- Employee rights and responsibilities are set out in Contracts of Employment, the Employee Handbook and other related employment documentation. The established conduct standards ensure we conduct our business responsibly, ethically and in accordance with applicable laws and regulation.
- We communicate this statement and the relevant internal policies to all our existing and new employees to ensure a high-level of understanding of Thomas Miller's position on modern slavery and

human trafficking.

- We also consider the need for training of key personnel to recognise the signs associated with modern slavery and what to do if they suspect these offences are being committed.
- We have systems in place to protect whistle blowers.

We are satisfied that the structure of these policies could enable the inclusion of additional, more explicit terms to cover respect for human rights and zero tolerance of modern slavery throughout the supplier organisation or in any part of our business if needed.

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