Slavery and Human Trafficking Statement

Lancashire Holdings Limited - Anti-slavery and human trafficking statement made on behalf of all companies within the Lancashire Group further to the provisions of the UK Modern Slavery Act 2015

Statement by the Chairman of Lancashire Holdings Limited

We are proud of the conditions of employment for all our employees throughout the Lancashire Group. Given the nature of our business, our boards and management teams each consider that there is minimal risk that, either within the Lancashire Group or the very limited supply chains which support our business activities, the Lancashire Group is involved in, supportive of, or complicit in slavery and human trafficking. The employment and procurement practices operated by the companies within the Lancashire Group ensure that those companies are rightly viewed as excellent and supportive employers. And to the extent that our Group companies operate as a purchaser of goods or services we expect a high level of ethical conduct from those suppliers with which we do business within our very limited supply chains.

About us and organisational structure

Lancashire Holdings Limited (Lancashire) is the holding company for a group of companies providing global specialty insurance and reinsurance products and services (together referred to as the Lancashire Group). Lancashire is incorporated and domiciled in Bermuda and has a premium listing on the London Stock Exchange. The companies within the Lancashire Group (which include UK incorporated companies including, but not limited to, those detailed in Schedule 1 to this statement) are either regulated insurance and/or reinsurance companies and service companies or serve a purpose ancillary to the Lancashire Group’s principal activities in insurance and reinsurance. The Lancashire Group currently operates from two main offices located in London and Bermuda and has over 200 employees worldwide. The Lancashire Group conducts the majority of its business in the UK and Bermuda but is licensed to underwrite insurance and reinsurance business in a large number of jurisdictions around the world.

Our supply chains

The Lancashire Group’s supply chains are very limited. The Lancashire Group offers insurance and reinsurance solutions which are a type of financial services product and so we consider the risk of modern slavery or human trafficking existing within our business or our supply chains to be relatively low. We do use routine services for the maintenance and support of our office operations in London and Bermuda, such as cleaning and technical support services for such things as air conditioning, IT, telephones and communications infrastructure. We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.
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**Anti-slavery Policy Statement:**

“The Lancashire Group has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.”

This Anti-slavery Policy Statement is the principal articulation of the Lancashire Group’s policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the Lancashire Group. It also reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

The Lancashire Group is committed to operating a responsible business to the benefit of all its stakeholders and respects, supports and complies with all relevant local Bermudian and UK legal requirements to which it is subject.

**Due diligence and implementation processes to mitigate the risk of slavery and human trafficking**

As part of our initiative to identify and mitigate risk (including in relation to that of slavery and human trafficking) we operate a range of controls and policies and procedures appropriate to the different companies within the Lancashire Group. These include the policies and procedures in the following areas:

- Third-party provider and outsourcing;
- Whistleblowing; and
- Anti-money laundering, bribery and financial crime.

The Lancashire Group also articulates a series of employee rights and benefits available to employees in the employee handbook and individual contracts of employment for each member of staff.

The Lancashire Group operates an HR department led by the Group Head of HR, a Legal and Compliance department led by the Group General Counsel, an Internal Audit department led by the Group Head of Internal Audit and also employs a Group Chief Risk Officer. The board of each of the principal subsidiary operating companies is required to note and agree to the terms of this statement. Each of these departments and executives have reporting responsibilities to management and the various boards of companies within the Lancashire Group. Additionally, Lancashire’s audit committee receives quarterly update reports from the internal auditors. A combination of these procedures and functions operates to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chains.

It should be specifically noted that the Lancashire Group operates in the UK as an accredited Living Wage employer by the Living Wage Foundation. This helps ensure that our employees and third-party contracted staff are paid in line with London Living Wage standards.

We seek to ensure when entering into material contracts that all those in our supply chain and contractors comply with our stated Anti-slavery Policy, in particular, when seeking tenders for service or when auditing our suppliers.

**Training**
We communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and to demonstrate our zero-tolerance approach. References to this statement are included as part of the Lancashire Group’s training and information materials.

**Legal and regulatory purpose of this statement**

This statement is made with regard to the obligations arising under section 54(1) of the UK Modern Slavery Act 2015. Although Lancashire itself is incorporated in Bermuda, it recognises the importance of these issues for all the Lancashire Group companies and the Group’s stakeholders. Accordingly, this statement should be considered to constitute the slavery and human trafficking statement for Lancashire and all companies within the Lancashire Group (in particular those listed at the end of this statement in Schedule 1) for the financial year recently closed, the current financial year and all future financial years until it may be modified or amended.

Peter Clarke  
Chairman of Lancashire Holdings Limited

Date: 1 May 2019

**RELATED LINKS**

**LANCASHIRE FOUNDATION**

The Lancashire Foundation, our charitable grant making body, is a key component not just of our community activity, but also of our corporate persona.

Discover more
RESPONSIBILITY INITIATIVES

The Group is strongly committed to giving back to the communities within which it operates.

ESG

The Group values its relations with, and works to support, its stakeholders to ensure the success of the business.

Lancashire

Investors
Investment case
Share Price
Results, Reports & Presentations
Annual Report 2019
ESG
Financial Calendar
Governance
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FAQs
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