MODERN SLAVERY ACT 2015

STATEMENT ON SLAVERY & HUMAN TRAFFICKING

Adopted on 13 March 2018
Randall & Quilter Investment Holdings Ltd. and its subsidiary businesses (the “Group”) is a diverse insurance group, headquartered and operating in Bermuda but with extensive operations in the UK, US, Bermuda and Europe. We provide products and services in the global non-life insurance market. We have a team of over 200 insurance professionals of whom 141 are based in the UK. Randall & Quilter Investment Holdings Ltd. is listed on the UK AIM market.

The Group has suppliers in the UK, Europe, USA, Bermuda, and India. Operating in the insurance industry, we believe the risk of modern slavery or human trafficking is low. We have a zero-tolerance approach towards modern slavery or human trafficking, and we continue to implement procedures and monitoring to prevent the occurrence of slavery or human trafficking in our business or in our supply chain. The same approach to complying with the legislation is expected from our suppliers and from our other business partners.

Our Progress

We have:

- Established a Group Modern Slavery Committee which meets regularly during the year

- Continued to monitor and revise the effectiveness of our procedures to ensure that slavery and human trafficking do not take place in our business or in our supply chain, including allocating responsibility for anti-modern slavery activities and documentation to committee members

- Reviewed our terms of business with recruitment agencies to include reference to Modern Slavery, and asked companies to provide their Modern Slavery Policies or Corporate Social Responsibility policies to us

- Commenced the detailed analysis of our UK supply chain by location, type of service, and contract value

- Delivered training to all appropriate staff to ensure a high level of understanding of the risks of modern slavery and human trafficking and how to increase transparency in our supply chains

- Agreed revised wording for rights to terminate contracts, if issues of non-compliance with the Modern Slavery Act 2015 are discovered, to be added to new and renewed contracts

- Updated our Whistleblowing Policy to include concerns about modern slavery or human trafficking in our supply chain as a reportable item

RQIH Modern Slavery & Human Trafficking Statement 2017
• Revised tender documentation to require supplier adherence to the Modern Slavery Act 2015, for use in new supplier due diligence procedures.

Next Steps – 2018

Our continuing actions in 2018 include:

• Risk-assessing our overseas suppliers by the same criteria applied to our UK suppliers. Once our High Risk suppliers have been identified, we will require them to complete a Due Diligence Questionnaire regarding their Modern Slavery policy and practices. We will then target our risk control activities appropriately.

• Adding modern slavery and human trafficking to our due diligence procedures in relation to procurement and corporate acquisitions.

• Raising awareness of modern slavery issues by the publication of information and guidance on modern slavery on the Group’s Intranet, including the procedures for reporting concerns and obtaining assistance.

• Nominating a Manager with responsibility for responding to any colleague questions about modern slavery, for maintaining a log of any concerns raised, and for coordinating the actions to address these.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group’s slavery and human trafficking statement for the financial year ending 31 December 2017. This statement has been approved by the Randall & Quilter Investment Holdings Ltd. board of directors, who will review and update it annually.

Kenneth Randall - Director

Date: 13 March 2018

RQIH Modern Slavery & Human Trafficking Statement 2017