2019 Statement on Modern Slavery and Human Trafficking

Randall & Quilter Investment Holdings Ltd.

Randall & Quilter Investment Holdings Ltd. and its subsidiary businesses (the “Group” or “R&Q”) 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 270 insurance professionals of whom:

- 171 are in the UK
- 79 are in the USA
- 10 are in Europe
- 10 are in Bermuda

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, and based on our analysis of our suppliers, we believe the risk to the Group 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 modern slavery or human trafficking in our business or in our supply chains. The same approach to complying with the legislation is expected from our suppliers and from our other business partners.

We aim to comply with legal and regulatory requirements everywhere we do business and to embed the values in our Code of Ethics in our activities. The Code affirms our commitment to compliance with equal employment opportunity laws and other applicable civil rights, human rights and employment and labor laws. R&Q expects staff to behave ethically and transparently and to be accountable for their actions. R&Q’s policies, frameworks and actions, which aim to prevent modern slavery and human trafficking in our business and supply lines include:

- undertaking employment verification checks as part of our hiring process
- requiring agencies who supply workers to carry out employment verification checks, wherever staff are located
- procurement questionnaires require third party suppliers to state what steps they take to comply with the Modern Slavery Act 2015
- procurement agreements require third party suppliers to comply with applicable laws and regulations
- subjecting key business transactions to both onboarding and periodic regulatory screening
- providing regular training for staff on sanctions restrictions, anti-bribery, anti-money laundering and modern slavery and anti-trafficking legislation
- providing training and support for all staff on how and where they can raise concerns about wrongdoing and assurances that they will not suffer reprisals for doing so; and
• taking appropriate action where potential violations of the Modern Slavery Act 2015, or equivalent legislation in countries in which we operate, are identified.

We continue to update our policies and procedures to make our commitment to anti-slavery and human trafficking explicit to our customers, employees, suppliers, and business partners.

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 2019. This statement has been approved by the Randall & Quilter Investment Holdings Ltd. board of directors, who will review and update it annually.