



Coverys Managing Agency Ltd

**ANTI-SLAVERY AND HUMAN
TRAFFICKING POLICY**

V1.0 April 2019

DOCUMENT CONTROL

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1. Introduction

1.1 Background

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Modern Slavery Act 2015 was ground breaking legislation and introduced to focus on increasing transparency in supply chains. Specifically, large businesses (with an annual turnover of £36 million or more) are required to disclose the steps it has taken to ensure the business and supply chains are free from modern slavery.

As a result, organisations such as Coverys Managing Agency Limited (CMAL) is required to report annually under Section 54 of the Act on the steps it has taken during the financial year to ensure that slavery and human trafficking are not taking places in its business or supply chains.

1.2 Objective

This Policy aims to provide clear and comprehensive guidance to all members of staff, together with contractors.

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for CMAL or under its control.

CMAL has a zero tolerance approach to modern slavery and it is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls are in place.

1.3 Scope and Application

This Policy applies equally to all individuals working at CMAL, including all permanent and temporary staff, members of and all third parties on CMAL's behalf in any capacity.

This Policy applies to the current managed Syndicate, including "live" business in Syndicate 1991 (S1991) and Syndicate 1975 (S1975); as well as "run off" or legacy business in Syndicate 3330 (S3330) and Syndicate 1110 (S1110).

This Policy does not form part of any employee's contract of employment and CMAL may amend it at any time.

1.4 Governance Responsibilities

The CMAL Board has overall responsibility for ensuring this Policy complies with CMAL's legal and ethical obligations, and that all those under its control comply with it.

The Head of Governance has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2. The Policy

CMAL's short Modern Slavery Statement is as follows:

'CMAL remains committed to respecting human rights in all its operations and external business dealings. Our commitment to human rights is reflected in the Anti-Slavery and Human Trafficking Policy.

CMAL recognises modern slavery, servitude, forced or compulsory labour and human trafficking ("modern slavery") as grave breaches of many human rights and freedoms. As required by the Modern Slavery Act (the Act), this statement describes the steps CMAL has taken during the financial year.'

This statement is published on the website. A full Modern Slavery Statement is attached at Appendix 1. All members of staff are required to comply with this Policy and to read and understand the full Statement.

2.1 Breaches of this Policy

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

CMAL may terminate its relationship with its third parties and organisations working on its behalf if they breach the terms of this Policy.

2.2 Whistleblowing

If any member of the staff believe or suspect a breach of this Policy has occurred or that it may occur they must notify their Line Manager and report it in accordance with the Whistleblowing Policy as soon as possible.

In the event that any member of the staff is unsure about whether a particular act, the treatment of workers more generally, or the working conditions within the supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager as soon as practicable.

CMAL encourages openness and support to anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. CMAL is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Please refer to the CMAL Whistleblowing Policy which is held on the SharePoint site for further guidance.

3. Resourcing, Training/Competency and Communication

Training on the risk CMAL faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

CMAL's zero-tolerance approach to addressing the issue of modern slavery in its business and supply chains is communicated to all suppliers, contractors and business partners at the outset of any business relationship and is reinforced as required.

It is a requirement for all members of staff at CMAL to complete the on-line training by the due date given by HR. Non-compliance with the deadline set will be escalated by the Line Management as required and appropriate action will be taken.

Modern Slavery Statement

This statement is made on behalf of Coverys Managing Agency Limited (CMAL), its Managed Syndicates at Lloyd's (syndicates 1110, 3330, 1975 and 1991), and its subsidiary companies (Coverys MA Service Limited, Coverys 1975 Underwriting Limited and DTW1991 Underwriting Limited)

CMAL is a Lloyd's managing agent registered, authorised and regulated in the UK. Its underwriting syndicates provide insurance products in the global non-life insurance market. There are approximately 150 staff in the UK. CMAL and its associated and subsidiary entities listed above are part of Medical Professional Mutual Insurance Company, Inc. of Boston, Massachusetts, USA.

Insurance provided by its syndicates may be handled via agents predominantly located in the UK, EEA, North America and Australasia. These agents may underwrite business or deal with claims on its syndicates' behalf.

Operating in the insurance industry, it believes the risk of modern slavery or human trafficking is low. It has a zero-tolerance approach towards modern slavery or human trafficking, and it operates procedures and monitoring to prevent the occurrence of slavery or human trafficking in its business. CMAL expects the same approach from its agents and from its business partners.

In support of the approach it has established an Anti-Slavery and Human Trafficking Policy which is overseen by the Governance Committee on behalf of the Board of Directors. This includes:

- a mandatory requirement upon all staff to complete appropriate training to ensure a high level of understanding of the risks of modern slavery and human trafficking and how to increase transparency from those we deal with. Satisfactory completion of the training is a condition of employment;
- making sure that the terms of business on which we trade with reflect our zero-tolerance approach and the law and allow us to terminate contracts in the event of non-compliance. This includes when assessing the suitability of our agents in other countries;
- a requirement to keep the effectiveness of the policy and procedures under regular review to ensure that a zero-tolerance approach is maintained;
- having an effective monitoring plan based on a proportionate risk assessment to detect and investigate possible instances of slavery and human trafficking in the business and agents; and
- updated our Whistleblowing Policy to refer explicitly to concerns about modern slavery or human trafficking as a reportable item.