



Coverys UK Holding Co. Ltd.

**ANTI-SLAVERY AND HUMAN
TRAFFICKING POLICY**

V2.0 2020

DOCUMENT CONTROL

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1. Introduction

1.1 Background

Modern slavery is a term used to describe slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. It is a crime and violation of human rights legislated against in the UK by the Modern Slavery Act 2015 (the “Act”).

This Policy covers Coverys UK Holding Co. Limited (“UK Holding”) and its subsidiary companies (Coverys Managing Agency Limited (“CMA”), Coverys MA Services Limited (“CMAS”) and Coverys European Holdings Limited (“CEH”)) and the subsidiaries of such subsidiary companies to which the Act applies (“Coverys”). Please see Schedule 1 for further information.

Pursuant to Section 54(1) Part 6 of the Act commercial organisations carrying out business in the UK and meeting the threshold criteria must prepare and publish an annual statement setting out the steps they take to prevent modern slavery every financial year. A commercial organisation is required to publish an annual statement if all the criteria below apply;

- it is a ‘body corporate’ or a partnership, wherever incorporated or formed
- it carries on a business, or part of a business, in the UK
- it supplies goods or services
- it has an annual turnover of £36 million or more.

As CMA is currently the only UK Holding’s subsidiary to meet the threshold criteria, it publishes this statement on its own behalf on its website. Previous statements are available on the Compliance page of the CMA intranet. The question of whether other UK Holding’s subsidiaries are also required to publish an anti-slavery and human trafficking statement will be reviewed on an annual basis.

1.2 Objective

This Policy reflects the zero tolerance of the Coverys Boards, regardless of whether the specific company produces an anti-slavery and human trafficking statement. to being associated in any way with modern slavery. 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 Coverys or under its control.

Coverys is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls.

1.3 Scope and Application

This Policy applies equally to all individuals working for or on behalf of Coverys in any capacity, including all permanent and temporary staff at all levels, directors, officers, contractors, secondees, agents and suppliers.

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

1.4 Governance Responsibilities

The Board of UK Holding has ultimate responsibility for ensuring compliance with this Policy and legal and ethical obligations. It has delegated management for compliance to the Boards of CMA (on its own behalf and on behalf of CMAS) and CEH (on its own behalf and on behalf of Coverys MGA (UK) Limited). The CMA Board in turn delegates management of the policy to the CMA Executive Committee.

Reporting into the CMA Executive Committee and the CEH Board, the General Counsel has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. The statement is reviewed annually by the General Counsel to ensure it remains relevant and up to date. The Policy is reviewed by the CMA Executive Committee and the CEH Board if material changes are required.

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

Coverys's approach towards modern slavery is as follows:

- Coverys remains committed to respecting human rights in all its operations and external business dealings.
- Coverys recognises modern slavery, servitude, forced or compulsory labour and human trafficking ("modern slavery") as grave breaches of human rights and freedoms.
- Coverys issues an annual Statement which describes (as required by the Modern Slavery Act) which describes the steps Coverys has taken during the previous financial year to ensure that its operations do not support modern slavery.
- Coverys has procedures in place to ensure that modern slavery plays no part in its business or within its supply chain.

All members of staff are required to comply with this Policy and to read and understand the Statement which is available on the CMA website.

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 (as set out in the Coverys MA Services Limited Disciplinary Policy which is set out in the Employee Handbook).

Coverys may terminate its relationship with third parties and organisations working on its behalf if they fail to demonstrate that they have sufficient controls in place to guard against being involved in modern slavery.

2.2 Whistleblowing

If any member of the staff believes or suspects 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.

Coverys encourages openness and support to anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. Coverys 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 its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Please refer to the Coverys Whistleblowing Policy which is held on the Compliance section of the CMA intranet for further guidance.

3. Resourcing, Training/Competency and Communication

Training on the risk Coverys faces from modern slavery in its supply chains, forms part of the induction process for all individuals (unless employed on a temporary contract of twelve weeks or less), and regular updated training will be provided as necessary.

It is a requirement for all members of staff at Coverys to complete the on-line training by the due date given by HR. Non-compliance with the deadline set will be escalated by HR to line management (and to the Executive Committee if required) for appropriate action.

Coverys zero-tolerance approach to modern slavery in its business and supply chains is reflected in its contractual arrangements with its suppliers, contractors and business partners at the outset of any business relationship and is reinforced as required.

Schedule 1 – List of companies

For the absence of doubt, this Policy applies to the following companies;

- Coverys UK Holding Co. Limited
- Coverys Managing Agency Limited
- Coverys MA Services Limited
- Coveys European Holdings Limited
- Coverys MGA (UK) Limited

In addition, this Policy applies to the following Syndicates under management;

- Syndicate 1991 (S1991)
- Syndicate 1975 (S1975)
- Syndicate 3330 (S3330) (2018 YoA)