

# **STATEMENT UNDER THE MODERN SLAVERY ACT 2015 for the year ended 31st December 2023**

Approved by the Board on 25 March 2024.

## **Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our statement, on behalf of our relevant UK entities and other group companies that carry on business in the UK, for the year ended 31st December 2023.

It is our assessment that, because of the business in which we are engaged and the nature of our supply chains, the risk of our organisation becoming involved in the support or encouragement of slavery or human trafficking is relatively low. We remain committed to taking steps to ensure that this does not occur in our business supply chain.

## **Organisation Structure**

Sompo in the UK is a direct provider of insurance and reinsurance primarily through two of our entities - Endurance Worldwide Insurance Limited (EWIL) which is incorporated in England and Wales, and SI Insurance (Europe), SA (SIIE), which is incorporated in Luxembourg, operating through a branch in the UK. EWIL and SIIE provide insurance and reinsurance across a range of classes of business in the UK, Europe and elsewhere in the world. Sompo also operates a number of other companies in the UK along with other companies domiciled elsewhere which do business in the UK. One of the UK companies, Endurance Business Services Limited (EBSL), provides a range of services to EWIL, including employing the staff who work for EWIL and contracting with third parties who provide services to EWIL. This statement is also given on behalf of Endurance Worldwide Holdings Limited, Endurance Holdings Limited and Sompo International Holdings (Europe) Limited.

We are part of the wider Sompo Holdings group of companies, the ultimate parent of which is Sompo Holdings, Inc. headquartered in Japan and traded on the Tokyo Stock Exchange.

## **Our Modern Slavery Act 2015 Policy**

Our Modern Slavery Act 2015 Policy (the "Policy") sets out our approach to addressing the risks of Slavery and Human Trafficking (as defined in the Act) and ensuring such activity is not taking place in our supply chains or in any part of our business. This Policy is supported in a manner such that a framework exists so our staff must act in compliance with all laws and regulations and that they behave ethically and with integrity. Furthermore, our policies specify that we expect the same high standards from those parties with whom we engage. We have several other policies which are also

relevant to the issue of modern slavery, including a whistleblowing policy, which is regularly reviewed, refreshed and distributed to staff.

Other impacted policies are regularly reviewed to ensure consistency with the Policy.

In addition, we have robust recruitment processes in place in line with local employment laws to protect against the risk of slavery and human trafficking in our business.

## **Our Supply Chains**

When considering our supply chains, we focus on those firms that we pay for the provision of goods and services, including some insurance intermediary firms when they are acting as our agent.

However, where we provide insurance/reinsurance to a client who has come to us through a broker, who derives their income from the client, we do not consider those brokers to be a part of our supply chain.

## **Due Diligence**

Where we engage third parties to supply goods and services to our businesses or where they act on our behalf, we are clear that we expect them to comply with all applicable laws and regulations. As part of our due diligence processes, we seek to obtain assurances as to our suppliers' approach to tackling slavery and human trafficking. We take a risk-based approach to managing the risks we face in respect to slavery and human trafficking; we will apply this approach to our supplier due diligence. Our risk-based approach in this area is informed by our assessment of risk that we have undertaken of our suppliers. This assessment of risk is an ongoing process.

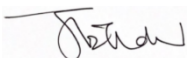
## **Training**

In addition to making our staff aware of the approach set out in our Policy, we also provide training to relevant staff to ensure they understand the risks of Slavery and Human Trafficking in our supply chains.

## **Review**

This statement will be reviewed annually and updated as necessary.

**Signed:**



**Bob Thaker**  
**Chief Executive Officer**