

Modern Slavery Act Statement

TRAVELERS EUROPE

Travelers Europe has zero tolerance of slavery and human trafficking. We are committed to taking appropriate steps to ensure that slavery and human trafficking does not occur in any part of our business or our supply chains.

Purpose of this statement

This statement is made on behalf of Travelers Management Limited, Travelers Insurance Company Limited, Travelers Syndicate Management Limited and Travelers Underwriting Agency Limited (together, “Travelers Europe”) and sets out the steps that Travelers Europe has taken, and is continuing to take, to ensure that slavery and human trafficking is not taking place in any part of its business or its supply chains.

About Travelers Europe

Travelers Europe offers customers a wide range of commercial insurance covers through Travelers Insurance Company Limited, which underwrites general insurance business from various locations in the UK and Ireland, and through its operations at Lloyd’s through Syndicate 5000, which underwrites specialist insurance globally and is managed by Travelers Syndicate Management Limited and Travelers Underwriting Agency Limited, which operates as an agent. Travelers Management Limited employs approximately 630 staff in the UK and Ireland, and provides the services of such staff and other services to the companies within Travelers Europe. All of these companies are incorporated in England and Wales.

The Travelers Companies, Inc., incorporated in Minnesota, USA, is the ultimate parent company of the companies within Travelers Europe. It is a leading provider of property liability insurance for motor, home and business. A component of the Dow Jones Industrial Average, the Travelers group has approximately 30,000 employees and more than 150 years of experience in the industry.

Supply chains

Our suppliers are businesses which supply services and products to support our core insurance business (the outsourcing of ancillary data entry and software development), the running of our offices (cleaning, security and maintenance services) and our IT infrastructure (supply and maintenance of systems, software and equipment).

Supplier due diligence

Our suppliers are procured in accordance with our Procurement and Vendor Contracting Policy, which ensures that we enter into supplier arrangements knowingly and with appropriate levels of review and approval. The ongoing monitoring and oversight of our supplier arrangements is carried out in accordance with our Supplier Management Policy.

Following the commencement of the Modern Slavery Act 2015 (the “Act”), we have adopted a risk based approach to assess the likelihood of the existence of modern slavery within our supply chains. We have considered factors that might indicate a risk of modern slavery, including the geographical location from which services are provided and the type of services being provided. Where we have identified a particular risk, we have undertaken enhanced due diligence by asking various questions of the suppliers’ staff and management during site visits regarding their terms of employment and their working environment. In addition to our existing contractual provisions that require suppliers to adhere to local employment laws, we are also incorporating appropriate provisions into the supplier contracts regarding compliance with the Act.

Policies

We require all employees, officers and directors to comply with our Code of Business Conduct and Ethics, which reflects our commitment to conduct business with honesty, integrity, and accountability. This is reinforced by various policies including the Whistleblowing and Non-Victimisation Policy, which encourages employees to report concerns about any conduct they believe to be unlawful, fraudulent, or unethical. We also provide an Ethics Helpline (administered by an independent third party provider) that can be used to disclose ethical concerns with guaranteed anonymity if requested.

Raising awareness

The directors have been briefed on the requirements and implications of the Act, and we have raised the awareness of those individuals responsible for managing higher risk suppliers of the potential risks. This statement will be communicated to all employees.

Further steps

During the next financial year, we will continue to identify, assess and manage risks on an ongoing basis. As part of that process, we will gather information from suppliers during the procurement and audit processes regarding their awareness of, and compliance with, the Act, and will ensure that appropriate contractual provisions are incorporated into supplier contracts.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Travelers Europe's anti-slavery and human trafficking statement for the financial year ending 31 December 2016.



Michael Gent, CFO

TRAVELERS EUROPE



Travelers Insurance Company Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Registered in England 1034343.

Travelers Syndicate Management Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Registered in England 03207530.

Travelers Underwriting Agency Limited is authorised and regulated by the Financial Conduct Authority. Registered in England 03708247.

Travelers Management Limited. Registered in England 00972175.

The registered offices for all companies listed above is: Exchequer Court, 33 St Mary Axe, London, EC3A 8AG.

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