

## Modern Slavery Act

*The UK's Modern Slavery Act 2015 requires all companies that carry on business, or a part of their business, in the UK and which have annual global turnover of at least £36 million to prepare and publish a Slavery and Human Trafficking Statement. The companies to which the Act applies have prepared such a statement, and it is set out below.*

## XL Catlin

### Slavery and Human Trafficking Statement

#### Introduction

This statement is made by XL Re Europe SE, XL Insurance Company SE, Catlin Insurance Company (UK) Limited, Catlin Underwriting Agencies Limited, XL Catlin Services SE, X.L. Global Services, Inc. and Catlin Syndicate Limited (together **the Reporting Companies**) that are required to report under section 54 of the Modern Slavery Act 2015 (**MSA**) and constitutes the Reporting Companies' slavery and human trafficking statement for the financial year ending on 31 December 2016.

#### Our business and supply chains

The Reporting Companies are members of the XL Group Ltd group of insurance and reinsurance companies, which use the global brand XL Catlin. XL Catlin provides property, casualty, professional and speciality products to industrial, commercial and professional firms, insurance companies, other enterprises and consumers throughout the world.

XL Catlin employs more than 7,300 people in over 30 locations worldwide. In the UK, we have five offices, employing 1,290 people.

Our products are distributed to clients through a large network of brokers and coverholders. We also underwrite insurance and reinsurance at Lloyd's of London, where one of our group companies acts as the managing agent for a number of syndicates.

The Reporting Companies' supply chain includes suppliers of IT and communications, property, facilities management, office equipment and supplies, catering, marketing services and professional services such as legal counsel, auditors, banks and recruitment agencies.

#### Our standards, policies and Codes of Conduct

Throughout the Reporting Companies' business, XL Catlin's five Commitments – *Make it Better, Collaborate, Be Future Focused, Be Accountable, and Do What's Right* – reflect who we are.

We believe that being a socially responsible company makes good business sense. Striving to achieve a balance between economic, social and environmental activity is in the long-term interests of the XL Catlin group and the communities where we operate. We believe in building our business ethically, responsibly and sustainably by respecting human rights.

The Reporting Companies are subject to a Code of Conduct (the **Code**), which has been in place since 2000 (as updated from time to time) and is communicated to all employees. In 2016, we started the process of reviewing the Code to strengthen our public commitment to the protection of human rights. This resulted in the current version of the Code, which was released in February 2017. The Code sets out the Reporting Companies' commitment to human rights and our policy of ensuring that all employees work of their own free will. The Reporting Companies do not accept corporal punishment, forced or involuntary labour or other forms of mental and physical coercion, and our commitment is to not use or permit the use of child labour.

Employees are asked annually to complete an online acknowledgment form in which they confirm compliance with the Code and the Code Supplement. This provides employees with an opportunity to report any Code violations that they have become aware of. The Reporting Companies have a process of enabling employees to report any Code breaches and we do not tolerate retaliation against employees who do so. We make every effort to investigate all alleged Code violations.

In addition, XL Catlin's annual Corporate Social Responsibility (**CSR**) report further sets out our commitments to CSR, as well as the steps we have already taken to be a socially responsible company.

### **Due diligence and steps to manage our human rights risks**

As part of our review of the Code in 2016, the Reporting Companies acknowledged the importance of ensuring that our business partners, such as suppliers, share our commitment to human rights. As a result, the Code now sets out our policy of working with business partners and suppliers who share our standards and commitment to human rights.

During 2017, the Reporting Companies intend to enhance their procurement processes by introducing appropriate MSA provisions into their template contractual documentation, as well as modifying their Procurement and Outsourcing Policy to promote greater awareness of the MSA.

### **Measuring effectiveness**

The Reporting Companies have established procedures for the reporting by employees and third parties of any concerns relating to illegal conduct and violations of the Code. Local laws and regulations on whistleblowing may apply to such reporting, and local policy and procedures are further explained in local employee handbooks. Employees who wish to report a Code violation may do so through:

- their upward reporting line
- a member of the Compliance team
- the Corporate Compliance Director
- the Chief Compliance Officer; and
- the online or telephone hotline tool "Ethicspoint" that allows anonymous reporting (subject to local law).

The Reporting Companies make every effort to investigate all alleged Code violations promptly, thoroughly and fairly. We do not tolerate retaliation against employees who report actual or alleged violations of the Code or Code Supplement made in good faith, and no adverse employment action will be taken for any employee making a good faith report.

### **Training Commitment**

Employees are required to complete periodic compliance training, and any new hires must complete an online training course regarding our Code upon joining a Reporting Company.

The Reporting Companies also recognise the importance of ensuring that certain employees and managers who are in a position to identify and respond to slavery and human trafficking risks in our business and supply chains are adequately supported and trained to prevent and detect illegal or unfair practices.

### **Approval procedure**

This statement has been approved by the board of directors of XL Re Europe SE, XL Insurance Company SE, Catlin Insurance Company (UK) Limited, Catlin Underwriting Agencies Limited, XL Catlin Services SE, X.L. Global Services, Inc. and Catlin Syndicate Limited.

R. Webb

XL Re Europe SE  
Rhic Webb, Director, June 2017

Paul Bradbrook

XL Insurance Company SE  
Paul Bradbrook, Director, June 2017

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