# Modern Slavery Act 2015 Statement 2022

Allied World Managing Agency Limited ("AWMA"), Allied World Capital (Europe) Limited ("AWCE"), Allied World Assurance Company (Europe) dac ("AWE"), AWAC Services Company (Ireland) Limited ("AWACS") and Gravity Underwriting Limited ("Gravity") (collectively, "Allied World") are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains.

#### **Our Structure and Business**

AWMA is a U.K. company that acts as a managing agent for Lloyd's Syndicate 2232, operating in the Lloyd's insurance and reinsurance markets. AWMA has subsidiary service company coverholders in Singapore and Bermuda. AWMA's business consists entirely of underwriting insurance and reinsurance at Lloyd's, and associated policy and claims administration.

- AWCE is a U.K. company and is the corporate member of Lloyd's Syndicate 2232.
- AWE is an Irish company operating in the specialty insurance and reinsurance markets. AWE has U.K. and Swiss branch offices. AWE's business consists entirely of underwriting insurance and reinsurance, and associated policy and claims administration.
- AWACS is an Irish company and has a U.K. branch office. AWACS' business
  consists of the provision of certain administrative services to AWMA, AWCE, AWE
  and other related companies.
- Gravity is a U.K. company operating in the specialty insurance market.

# **Our Supply Chains and Risk Assessment**

As a provider of insurance and reinsurance solutions to our customers, Allied World's supply chains include global and local insurance brokers, underwriting agencies, claims administrators, reinsurers, information technology providers, consultancy and professional service providers such as legal advisers and tax consultants, as well as cleaning, telecommunications and utilities service providers.

Allied World has undertaken a modern slavery risk assessment of its supply chain partners by size of supplier, sector and geography. Given the nature of our business, the industry in which we operate and our supply chain profile, we have assessed our risk of involvement in modern slavery and human trafficking to be low. Allied World does not act as a producer or retailer of physical goods, and has no supply chains relating to such activities. Moreover, as an insurance and reinsurance service provider, we do not procure goods and services from sectors typically considered to have high modern slavery risks.

### **Supplier Due Diligence**

Although we have assessed our modern slavery risk to be low, Allied World will, using a risk-based approach, continue to assess and monitor the modern slavery risks of our supply chain partners in order to ensure high standards in ethical and professional behavior, including with respect to compliance with modern slavery and human trafficking regulations.

Such ongoing assessment and monitoring process may include making queries of our suppliers relating to their modern slavery risks for engagement and as part of any periodic review, assessing our suppliers' responses to determine the potential for such risks and the magnitude thereof (e.g., high, medium or low risk), considering whether the potential risks warrant the imposition of additional requirements or controls on our suppliers (e.g., requesting an anti-slavery certification or requiring the supplier to take other reasonable measures to manage these risks) and considering whether and to what extent remedial action may be necessary or the arrangement should be reconsidered.

### **Our Work Force**

Given the nature of our business, most of our employees are professionals with higher educational qualifications. These employees are involved in underwriting insurance and reinsurance risks or in providing associated policy and claims administration or other professional services. Accordingly, we have assessed our modern slavery risk in this respect to be low. During the recruitment process, we will, depending on the seniority of the role, verify a candidate's eligibility to work. We have in place written contracts of employment with all of our employees and conduct our operations in compliance with all relevant employment, work, health and safety legislation. All new employees are provided with onboarding training, including training on business conduct and ethics. Allied World is an equal opportunity employer and also has in place policies against unlawful discrimination, bullying, harassment, retaliation and victimization. We encourage an open communication between our employees and also have in place whistleblowing channels.

### **Policies**

Allied World maintains numerous policies, including in relation to conduct, outsourcing, whistleblowing, compliance and financial crime related matters, all of which support our continuing efforts to monitor and address the risk of improper behavior by those within Allied World and its supply chains. Allied World also maintains policies and procedures for the protection of its own employees.

## **Assessing the Effectiveness of Our Actions**

On an ongoing basis, we assess the effectiveness of the actions we have taken to manage modern slavery risks in various ways. These include undertaking periodic reviews of our regulatory compliance, including compliance with modern slavery laws; comparing our processes and procedures against those of comparable market participants and against legislative guidance; and addressing any compliance issues that may be identified.

#### **Awareness**

In order to promote awareness of the risks of modern slavery and human trafficking, we will make this statement available to our staff.

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Lee Dwyer

Director of AWE and AWACS

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Director of AWCE

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\_28\_ September 2022