



# Assurant Group Limited and TWG Europe Limited

## Modern Slavery Statement Y/E 2019

This statement has been published in accordance with s.54 of the Modern Slavery Act 2015. It sets out steps taken by Assurant Group Limited, Assurant Direct Limited, TWG Europe Limited and their respective UK subsidiaries during 2019 to prevent modern slavery in any form occurring in their businesses or supply chains.<sup>1</sup>

### Our Business



The entities in scope of this statement form part of Assurant, Inc.'s global business with approximately **15,000 employees** and a market presence in 21 countries.



We have an active network of over **1,000 suppliers** across Europe.

### Slavery Today



Modern Slavery in the UK is **10 times** higher than initial estimates.<sup>2</sup>



UK nationals make the **biggest** group of potential victims.<sup>3</sup>

As we report on our progress during 2019 we are increasingly mindful of the escalating global challenge presented by COVID-19 and the expected longer-term challenges this unprecedented event will bring to our own business, colleagues, suppliers, and ultimately workers all over the world. Now, more than ever, we remain committed to doing the right thing as a business.

In January 2020, Assurant formed an Enterprise Crisis Management Team (ECMT) to monitor and track the emerging COVID-19 virus. The collaborative ECMT is comprised of business leaders and functional areas, including risk management, legal, facilities, HR, communications, Supply Chain and business continuity. The goal of the ECMT is to focus on the health and wellbeing of our employees while also executing on strategies that ensure we continue to effectively service our clients, customers and Supply Chain functions throughout 2020-2021.

### What is Modern Slavery?

Modern Slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. It is a global issue, regardless of the type of economy we live in or industry we work in. In addition, given the rapid rise in global migration, modern slavery is a growing problem.

Assurant has a zero-tolerance approach to any form of modern slavery. This statement demonstrates our commitment to ensure we act ethically, with integrity and transparency in all our business dealings, and that we will continue to work to improve our systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chains.

### Our Business and Supply Chains

Assurant is a leading provider of housing and lifestyle solutions. We help our global clients protect and support the major purchases that consumers make, like their homes; cars; appliances; mobile phones; and consumer electronics protection. Serving more than 33 million customers

<sup>1</sup> This statement sets out the steps taken by Assurant Group Limited and its UK subsidiaries (Assurant General Insurance Limited, Assurant Life Limited, Lifestyle Services Group Limited, Assurant Intermediary Limited, Assurant Direct Limited, Assurant Device Care Limited and Digital Services (UK) Limited) and TWG Europe Limited and its UK subsidiaries (London General Insurance Company Limited, London General Life Company Limited and TWG Services Limited)

<sup>2</sup> <https://www.express.co.uk/news/uk/991587/modern-slavery-uk-figures-statistics-home-office-2018>

<sup>3</sup> <https://www.antislavery.org/slavery-today/slavery-uk/>

<sup>3</sup> <https://www.express.co.uk/news/uk/991587/modern-slavery-uk-figures-statistics-home-office-2018>

<sup>3</sup> <https://www.antislavery.org/slavery-today/slavery-uk/>



in Europe.

Partnering with global leaders including mobile operators, financial service providers, automotive dealers and retailers to allow their customers to 'protect the things that matter most'.

In Europe, Assurant's Supply Chain operates in the UK and Europe. The majority of services are contracted through third party providers. The third-party services include repair of devices and automobiles; courier services (direct to customers); logistics services; data wipe; data destruction; and the purchase of devices. Devices are purchased directly from Original Equipment Manufacturers, networks and major distributors. Our wider supplier network comprises over 1000 different suppliers.

## Policies and Contractual Controls

We operate a number of internal policies to ensure that our employees conduct business in an ethical and transparent manner. All policies are accessible to employees via the company intranet site. These include:

1. **Our Modern Slavery policy** which sets out the organisation's stance on modern slavery and explains how our employees can identify instances of this and how they must report it.
2. **Our Code of Ethics / Anti-Bribery policy** which contains guidance on how to apply our values and ethical standards in day to day business and how to report any concerns. Our employees are expected to engage in and promote honest and ethical conduct and report any possible violation of these standards. All employees are required to undertake mandatory training to ensure that they understand the company's ethical standards. Violation of our code of ethics is a disciplinary offence.
3. **Our Whistleblowing policy** which encourages our employees to raise concerns regarding practices within our business and supply chain without fear of reprisal. Employees are required to complete mandatory training on our Whistleblowing Policy annually.

We expect the same high standards from all of our contractors, suppliers and other business partners, therefore we have amended our **standard supplier contractual terms** to include obligations on suppliers to comply with our **Supply Chain Code of Conduct**. Failure to comply with our Code would constitute a material breach of the supplier contract.

## Our due diligence and audit processes

Every new supplier we engage to conduct business on our behalf is required to follow our stringent due diligence checks prior to completing contracts. Our due diligence checks in relation to the prevention of Modern Slavery include a vendor conformity checklist which requires the company to declare any non-conformity to our high standards, including in relation to human rights.

We have introduced a **Supply Chain Code of Conduct**, which imposes a duty on our suppliers to act at all times with the highest standards of integrity, ethical conduct and social and environmental responsibility. It reiterates that we will not tolerate or condone any abuse of human rights within any part of our business or supply chain. All of our suppliers are required to sign a declaration stating they commit to comply with all requirements incorporated into the code before acting on our behalf.

We have also introduced a **Supply Chain Compliance Risk Framework** which allows us to monitor our key risks, including the risk of Modern Slavery occurring in our supply chain. As part of the risk



framework our dedicated Supply Chain Compliance Officer conducts audits and implements mitigating controls where required.

## Assessment of Modern Slavery risk within our supply chain

As our business continues to grow, we recognise our company's exposure to risk increases the more expansive our supply chain becomes. Therefore, we have increased our Compliance oversight capabilities within our wider business operations. The appointment of a dedicated resource for Supply Chain Compliance, has responsibility for the ongoing oversight of our supply chain risks, including Modern Slavery. Since the appointment, we have conducted a risk assessment of our third party logistics and repairers, assessing them on specific supply chain compliance risk categories.

Following the completion of the risk assessment, we are working with our third party suppliers to encourage the adoption of our best practices, as well as to identify where their controls can be strengthened so that we can all protect the people who work in our supply chain from any form of human rights abuse.

## Modern Slavery Training

To ensure a high level of understanding of the risks of Modern Slavery in our supply chains and our business, we have developed and delivered mandatory training on Modern Slavery to all relevant employees.

The training provides information on the different forms of Modern Slavery, some common indicators to look out for and the actions an employee must take if they suspect that it is occurring within our business and supply chain. This training forms part of the on boarding process for roles which have the closest contact with our supply chain and refresher training is delivered to relevant employees annually.

We have cited our existing whistleblowing procedure as one route for employees to report instances of Modern Slavery.

## Further steps to prevent Modern Slavery in our Supply Chain

Although we have made significant progress last year in raising awareness of Modern Slavery and implementing preventative controls, we need to remain vigilant. We will:

1. Continue to integrate The Warranty Group with Assurant and align our modern slavery efforts across both organisations to ensure we have consistency in our processes and tools.
2. Continue to conduct risk based on-site Audits on suppliers to assess their culture and controls relating to labour and human rights and provide recommendations for improvements.
3. Review the previous year's initiatives intended to mitigate the risk of Modern Slavery for effectiveness and consider potential improvements for the coming year.



## Measuring how we're doing

We will check how we are measuring against our business standards in a number of ways:

1. We will measure the number of audits completed the outcomes and actions implemented.
2. We will regularly review and monitor completion of our Modern Slavery training.
3. We will test a segment of our employee population and obtain feedback to measure awareness and the success of our messaging campaign.
4. We will track instances of Modern Slavery practices identified in our business or supply chain by employees, members of the public or law enforcement agencies and the remedial actions taken in response.

Due to unexceptional disruption to our business and Supply Chain during the COVID-19 pandemic in the UK during 2020, we delayed the publication of this statement whilst we focused on continuity of our operations.

This statement was approved by the Board of Directors on 16 December 2020

Christian Formby  
President, Europe / Director

For and on behalf of Assurant Group Limited, Assurant Direct Limited and TWG Europe Limited

16 December 2020