



Introduction

In accordance with section 54(1) of the Modern Slavery Act 2015 (“MSA”), this statement provides details of the measures that we take to prevent slavery and human trafficking occurring in our business and supply chains.

This statement covers Assurant’s UK group companies, Assurant General Insurance Limited, Lifestyle Services Group Limited and Assurant Device Care Limited, all of which are required to comply with the MSA.

It also covers the business and supply chain of other Assurant UK companies for openness and transparency, including London General Insurance Company Limited and TWG Services Limited, although those companies are not required to comply with the MSA. Together all these firms are referred to as “Assurant UK” in this statement. A list of the principle operating companies is included in the appendix.

Our organisation’s structure, its business and its supply chains

Assurant UK is part of the global Assurant group headed by Assurant, Inc. (NYSE:AIZ). Assurant is a leading global business services company that supports, protects and connects major consumer purchases. A Fortune 500 company with a presence in 21 countries, Assurant supports the advancement of the connected world by partnering with the world’s leading brands to develop innovative solutions and to deliver an enhanced customer experience through mobile device solutions, extended service contracts, vehicle protection services, renters insurance, lender-placed insurance products and other specialty products.

Assurant UK offers a selection of these products in the UK primarily on a business to business to consumer basis. We focus on three defined business lines:

1. Connected Living - in our Connected Living business we help protect, connect and support the things consumers buy, like connected devices and mobile phones. Our services include mobile and gadget device protection, product extended warranties, technical support and device lifecycle services such as trade-ins and upgrade programs. The Connected Living sector stretches across many areas including banks and financial institutions, mobile networks, retailers and device manufacturers.
2. Automotive - we have integrated capabilities to provide our Automotive partners with configurable solutions. We provide a range of products including automotive warranty, guaranteed asset protection, cosmetic protection and service plans. We act as the insurer, administrator and claims handler for anything automotive related making it simpler and more convenient for our partners and their customers.
3. Housing - intermediation of home and renters insurance products

Our European Head Office is in the UK. We also have offices in each of the other main European markets in which we operate. In the UK we operate our own bespoke device care facility designed specifically for Assurant staff and customers, enabling us to work on customers’ devices quickly and carefully.

We have an extensive supply chain, which covers a wide range of products and services across multiple suppliers, which each present different levels of risk and management requirements. Our supply chains differ by line of business:

1. **Connected Living** - we source repairs, parts and replacements for customers' broken or lost devices from the original equipment manufacturers (e.g. Apple) and a limited number of repair partners based in the UK and Europe. We may also direct customers to our partners' high street retail repair stores. In 2022 the roll-out of our own franchise network of repair stores ("Pocket Geek Tech Repair") continued to further increase options to solve our customers' problems. Our Connected Living supply chain also involves the services of several logistics firms as we seek to collect and return our customers devices.
2. **Automotive** - we source repairs to our customer vehicles through a network of responsible UK automotive dealerships. Whilst we seek to direct customers to the dealerships they originally bought the vehicle from, or those repairers that we know and trust, some customers may also choose to use other repairers outside of our networks. A significant proportion of the dealerships and repairers that we use are accredited and approved by major UK motoring organisations.
3. **Housing** - as an insurance intermediary only in Housing we have very little by way of direct supply in relation to the business that we administer with claims fulfilment being the responsibility of the underwriting insurer.

In addition to the above, we have sourced a range of Corporate Services from third parties and other group companies e.g. consulting, IT licensing and support, recruitment, insurance, facilities etc primarily in the UK, European Union and the United States.

Our policies in relation to slavery and human trafficking

We are guided by 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. **Assurant Modern Slavery policy:** 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. Employees are required to complete mandatory training on our Modern Slavery obligations annually.
2. **Code of Business Conduct and Ethics:** 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. **Assurant Whistleblowing policy:** 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 our contractors, suppliers and other business partners as set out in our Supplier Code of Conduct.

More details on our Code of Business Conduct and Ethics and on Assurant Supplier Code of Conduct can be found on our global website [Ethics pages](#).

Our due diligence in relation to slavery and human trafficking in our business and supply chains

We periodically evaluate how to identify and address risks in each category of our supply chain, including those related to modern slavery and human trafficking.

To map and mitigate risk, we use a variety of methods which allow us to undertake due diligence on our suppliers and ensure that we have appropriate policies and contractual terms in place, so that our suppliers understand the standards that we require of them. To the extent that our suppliers do not adhere to our standards, there can be material consequences, including the termination of our relationship with them.

We share our Assurant Supplier Code of Conduct with all new suppliers at inception and request that they attest to those standards. The standards are also embedded in our standard contract terms. Dependent on the risk varying levels of due diligence is performed on those suppliers' processes and procedures to ensure that they meet our expectations.

Assurant globally was re-accredited in 2022 in relation to Economic, Social and Governance ("ESG") matters by an independent third party. This includes assessment of our performance in respect of labour rights for our own staff and within our supply chain. We continue to take the results and recommendations from these assessments to improve processes going forward.

Also in 2022 we created and recruited the specific role of Sustainability Director, Europe. The Sustainability Director will continue to drive improvements in our practices and reporting across relevant sustainability topics including slavery and human trafficking. As a result we are also conducting a European ESG impact assessment, with support from external experts, and plan to restructure our existing ESG working group and governance structure to improve monitoring of our ESG related processes in Europe.

More details of Assurant's global sustainability program can be found on our [Assurant Sustainability pages](#).

Parts of our business and supply chains where there is risk of slavery and human trafficking taking place, and the steps we've taken to assess and manage that risk

A risk assessment is performed to identify the risk areas within our business and supply chains, where there is a risk of slavery and human trafficking taking place. This assessment has confirmed that the largest risk areas exist within our indirect workforce and the third-party service providers that we partner with.

This risk assessment is a living document that is reviewed at least annually to accompany the publication of our Modern Slavery Statement. As part of the risk assessment business leaders have confirmed the controls that they operate to mitigate the risks of modern slavery within our business.

We believe our risk of exposure to modern slavery in our direct workforce is low. This is due to our employees being primarily based in the UK and Europe where they are screened pre-employment and operate within working environments where established training courses, policies and procedures are maintained and enforced. Nevertheless, our People Organisation remain vigilant and attentive to any signs of modern slavery within our direct workforce or control enhancement opportunities.

Our Facilities teams also ensure our offices are maintained to a high standard, meeting health and safety and working place standards. Furthermore, with a large proportion of our workforce now working from home there are annual e-learning on stress awareness and an online workplace assessment. Employees can also request a desktop assessment, with any recommendations from these being fulfilled.

Our risk increases with our indirect workforce, those supplied by third parties due to the limited visibility into our partner's operations and hiring practices, however our use of such workforce is limited. Though to combat potential modern slavery risks associated with an indirect workforce, we perform due diligence prior to appointment and implement contractual requirements for our partners to adhere to the minimum employment age limits, wage minimums, working hours and benefits defined by applicable laws and regulations etc. Where applicable, we require suppliers to provide their modern slavery statement as part of our ongoing vendor management.

Our risk also increases with our supply chain, again due to the limited visibility into their operations and hiring practices. However, our suppliers within our Connected Living business are the manufacturers and within Automotive are established suppliers meeting set requirements. Most of our suppliers are UK-based entities that we deal with directly or intercompany transfers from the EU and US. In 2023, with the roll-out of our Pocket Geek Tech Repair franchise, we will specifically consider any additional modern slavery risks that may arise.

Within the terms and conditions of our Auto warranty products customers can go to a non-contracted garage for their repair. Unlike our contracted garages we will not have performed due diligence, embedded code of conduct within a contract or performed onboarding and training. Most of our engagements with these garages are one-off, but if there was repeat use by customers we would seek to onboard those garages.

All our employees and contractors are notified of our whistleblowing service where any concerns can be raised and investigated.

The training and capacity building about slavery and human trafficking available to our staff

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 our employees.

The annual mandatory e-learning 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 all employees annually.

We have cited our existing whistleblowing procedure as one route for employees to report instances of Modern Slavery of which, an annual e-learning is also required to be completed by all employees.

This statement was approved by the Board of Directors on May 12, 2023.



Christian Formby

President, Europe / Director

12th May 2023

Appendix 1: Legal Entities

Assurant UK group structure incorporates:

- Assurant Group Limited (“AGL”) a UK wholly owned subsidiary of Assurant and the parent of two UK insurance companies, Assurant General Insurance Limited and Assurant Life Limited*. AGL also owns directly, and indirectly, a number of other regulated insurance intermediaries and unregulated non-insurance companies in Europe.
- TWG Europe Limited (“TWGE”) is also a UK wholly owned subsidiary of AIZ and is the parent of two UK insurance companies, London General Insurance Company Limited and London General Life Company Limited and a number of other companies in Europe, including two Dutch insurance companies, Assurant Europe Insurance NV and Assurant Europe Life Insurance NV.

Companies required to comply with the Modern Slavery Act 2015

Company	Activity	Main Business Line
Assurant General Insurance Limited	Authorised General Insurer	Connected Living
Lifestyle Services Group Limited	Authorised Insurance Intermediary	Connected Living
Assurant Device Care Limited	Mobile device repair and lifecycle services	Connected Living

Companies not required to comply with the Modern Slavery Act 2015

Company	Activity	Main Business Line
Assurant Group Limited	Holding company	Not applicable
Assurant Life Limited	Authorised Life Insurer*	Connected Living
DS UK Limited	Repair services	Connected Living
Assurant Direct Limited	Authorised Insurance Intermediary	Connected Living
Assurant Co. (PG UK), Ltd	Repair services	Connected Living
Assurant Intermediary Limited	Authorised Insurance Intermediary	Housing
TWG Europe Limited	Holding company	Not applicable
London General Insurance Company Limited	Authorised General Insurer	Automotive
London General Life Company Limited	Authorised Life Insurer	Automotive
TWG Services Limited	Authorised Insurance Intermediary	Automotive

*Assurant Life Limited ceased operating as a life insurer in 2022 and entered voluntary liquidation in 2023.

This statement does not cover the activities or supply chain of a fellow Assurant company, The Warranty Group Services (IOM) Limited based in the Isle of Man but which undertakes business in the UK.