



MODERN SLAVERY ACT 2015

STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

Adopted on 13 March 2019

2018 Statement on Modern Slavery and Human Trafficking

Randall & Quilter Investment Holdings Ltd.

Randall & Quilter Investment Holdings Ltd. and its subsidiary businesses (the “Group”) is a diverse insurance group, headquartered and operating in Bermuda but with extensive operations in the UK, US, Bermuda and Europe. We provide products and services in the global non-life insurance market. We have a team of over 200 insurance professionals of whom 141 are based in the UK. Randall & Quilter Investment Holdings Ltd. is listed on the UK AIM market.

The Group has suppliers in the UK, Europe, USA, Bermuda, and India. Operating in the insurance industry, and based on our analysis of our suppliers, we believe the risk to the Group of modern slavery or human trafficking is low. We have a zero-tolerance approach towards modern slavery or human trafficking, and we continue to implement procedures and monitoring to prevent the occurrence of modern slavery or human trafficking in our business or in our supply chain. The same approach to complying with the legislation is expected from our suppliers and from our other business partners.

Our Progress

In the course of 2018, we have:

- Continued to monitor the effectiveness of our procedures to ensure that modern slavery and human trafficking do not take place in our business or in our supply chain.
- Analysed the performance of the largest contract value suppliers in our UK supply chain against the requirements of the Modern Slavery Act 2015. We issued a Modern Slavery and Human Trafficking Questionnaire to current and potential new suppliers, recording the findings on the Supplier Review Log, and reporting the findings to the Group Modern Slavery and Human Trafficking Committee.
- Gathered information on suppliers to the overseas operations and issued guidance on the vetting of these suppliers.
- Added reviews of modern slavery and human trafficking risk to our due diligence procedures in relation to procurement and corporate acquisitions.
- Established a contact point for the reporting of any concerns about modern slavery and human trafficking, and communicated to all staff the creation of a dedicated Modern Slavery inbox.
- Allocated training to all appropriate staff to ensure a high level of understanding of the risks of modern slavery and human trafficking and how to increase transparency in our supply chains; over 90% of UK staff have now completed the training.

Next Steps – 2019

Our continuing actions in 2019 include:

- Embedding the modern slavery and human trafficking risk assessment process operationally.

- Developing the Group approach to modern slavery and human trafficking within a wider procurement policy and procedure.
- Positioning the Modern Slavery and Human Trafficking Committee as a forum for monitoring legislative developments and continuing to raise awareness of the subject in the Group.
- Reviewing and communicating the policy for the monitoring of suppliers to the R&Q overseas operations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 December 2018. This statement has been approved by the Randall & Quilter Investment Holdings Ltd. board of directors, who will review and update it annually.



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Kenneth Randall – Director

Date: 13 March 2019

