

# MODERN SLAVERY ACT 2015 STATEMENT

## Anti-Slavery & Human Trafficking Statement

### Introduction

This statement is made on behalf of Starr Companies<sup>1</sup> and it sets out the actions taken by Starr to understand all potential modern slavery risks related to its business, and those in its supply chain, and to put in place measures to prevent slavery or human trafficking related to its business. Unequivocally Starr Companies oppose all forms of slavery, servitude and forced or compulsory labour, and human trafficking (collectively hereafter "Slavery"). Starr operates internal controls and procedures to ensure Starr Companies do not engage with third parties that do not uphold these values and standards.

Starr Companies issue this Statement in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 of the United Kingdom for the year ending 31 December 2017.

### Organisational Structure

Starr Companies is a global insurance and financial services company. Its primary business is underwriting property and casualty insurance for large, commercial insureds. Starr Companies primary insurance operating companies are subsidiaries of Starr Insurance Holdings, Inc., a Nevada entity. Starr relies on affiliated agencies and non-affiliated agents and brokers to distribute its insurance products.

### Supply Chain

Starr Companies, as an insurance and financial services company, presents low overall risk for Slavery. Starr uses a range of global services to provide effective insurance products that deliver expected standards to policyholders and employees. The products and services purchased range from consultants, IT software/hardware, claims handlers, intermediaries, and professional advisors to cleaning and catering services. We only engage with service and product providers that demonstrate the same commitment to opposing slavery.

### Supplier due diligence

Each of the Starr entities maintain appropriate controls and oversight to ensure the engagement of third party suppliers is in accordance with accepted business practices and principles. The appointment of a supplier requires a due diligence process to assess the suitability of the provider to deliver the service at the required standard and within agreed values and principles. The level of due diligence undertaken is dependent upon the location of the provider and the product and/or service to be purchased. Due consideration is given to the provider's own processes for the use of third party suppliers to ensure appropriate conduct throughout the business chain. The due diligence process is kept under review in each Starr entity to ensure the process remains appropriate and fit for purpose.

### Employee Conduct

Starr Companies maintain a written Code of Conduct that prohibits, among other things, Slavery and related activities. Starr Companies takes great pride in the people it employs and in their job performance. Starr Companies enforces the high standards it expects from its employees through a rigorous pre-hire screening process, the Code of Conduct and ongoing compliance training, including mandatory training on the Slavery Act. Engaging in any Slavery-related activities would be a violation of Starr Companies' Code of Conduct and would expose the employee to disciplinary action up to and including termination.

Starr Companies operate within the local laws and regulations of the countries from which they operate. It offers employees a safe and healthy work environment promoting employee wellbeing and development. Remuneration is in accordance with local laws and regulations and subject to the local taxation regulations.

Each Starr entity also maintains a Whistleblowing Policy that ensures protection for employees should they identify and raise concerns regarding conduct and behaviour within the organisation. Should employees witness a breach of the Starr Code of Conduct or engagement with suppliers that do not uphold the Starr values against slavery, they are able and encouraged, to make an anonymous notification under the Whistleblowing Policy.

### **Application**

This Anti-Slavery & Human Trafficking Statement is made in compliance with s54(1) of the Modern Slavery Act 2015.



Adrian Missen

Chief Operations Officer

Date: 31 October 2018

<sup>1</sup> Starr Companies is the worldwide marketing name for the operating insurance and travel assistance companies and subsidiaries of Starr International Company, Inc. and for the investment business of C. V. Starr & Co., Inc. and its subsidiaries.