

Aspen Modern Slavery Act Statement

Aspen Insurance UK Limited

Australian Branch

This statement is published in accordance with the UK's Modern Slavery Act 2015, Modern Slavery Act 2018 (Cth), Modern Slavery Act 2018 (NSW) and the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) ("the Acts"). It sets out the steps taken by Aspen Insurance UK Limited ("Aspen") to ensure that slavery and human trafficking do not exist in our business or supply chains.

Introduction

Aspen Insurance UK Limited ("AIUK") is a London based, wholly-owned subsidiary of Aspen European Holdings Limited ("AEHL"). AEHL is a wholly-owned subsidiary of Aspen Insurance Holdings Limited ("AIHL").

Aspen Insurance UK Limited ("AIUK") commenced writing business in Australia as an APRA authorised category C general insurer in November 2008. In 2015, we established an Australian Branch based in Sydney, NSW, employing three staff (two underwriters and an assistant). In April 2023, we closed the Sydney Office and there are no longer any employees in Australia. Through Aspen Insurance UK Services Limited ("AIUKSL"), 538 staff are employed within AIUK and there are 1,067 employees within the entire Aspen group of companies.

Throughout the Aspen group, including our subsidiaries and Branches, any form of modern slavery, forced labour, child labour and/or human trafficking will not be tolerated. Aspen is fully committed to operating its business ethically and fairly and we have robust frameworks and processes in place to minimize the risk of modern slavery, forced or child labour, in our business operations and supply chains.

Our Business

Aspen is a leading specialty insurance and reinsurance company with core platforms in the UK, US and Bermuda. Aspen provides casualty, cyber, management liability, professional indemnity, marine, credit & political risks, crisis management, property and energy & construction products.

Our group is financially strong and for the year ended December 31, 2023, we reported US\$15.2 billion in total assets, US\$7.8 billion in gross reserves, US\$2.9 billion in total shareholders' equity and US\$4.0 billion in gross written premiums. Our operating subsidiaries have been assigned a rating of "A-" by Standard & Poor's and an "A" ("Excellent") by A.M. Best.

Risks of Modern Slavery Practices in Operations and Supply Chains

When considering the supply chain of AIUK, those entities that are paid for the provision of goods and services, including insurance intermediary firms acting as an agent for AIUK, are the primary focus. Where AIUK provides insurance or reinsurance to an insured by way of a broker, who derives income from the insured, those brokers are not considered to be part of AIUK's supply chain. Similarly, the insureds are not considered to be a part of the supply chain.

Our supply chain includes but is not limited to IT Hardware and Software, IT Services and Telecoms, Outsourcing, Professional Services (such as consultants, auditors and legal services), Facilities Management and Property Services, Hard and Soft Services such as cleaning services, catering services, building maintenance, utilities, security, construction management, furniture procurement, etc, Travel Services, Banking services, HR services (such as recruitment services, Learning & Development services, benefits and payroll etc), Market Data services and Marketing services.

Throughout 2023, AIUK has continued to assess the risk of modern slavery practices in both its operations and its supply chains, so as to ensure compliance with all relevant laws and regulations.

As the core business engaged in by AIUK is the provision of insurance and reinsurance products and services, AIUK considers the risk of becoming involved in modern slavery practices relatively low, especially considering the nature of the related supply chains. AIUK continues to remain alert to all areas of its operations and supply chains so as to monitor new risk areas.

Our Policies

We have prepared and implemented an amendment to our Code of Business Conduct and Ethics ("the Code"), applicable to all employees within the Aspen group, to state that Aspen takes a zero tolerance approach to slavery, forced labour, child labour and human trafficking and is committed to ensuring that there is no slavery, forced labour, child labour or human trafficking in our business or supply chains. This is reflective of the Code's general commitment to integrity in the conduct of our business and the requirement that all Aspen employees perform their duties in a manner, which is legally, ethically and morally irreproachable.

Other relevant policies, including our Group Outsourcing Policy and Group Procurement Policy, have also been reviewed and amended to highlight the need to consider slavery, forced labour, child labour and human trafficking issues when selecting and engaging with suppliers.

We have a Whistleblowing Policy under which employees can report any issues or concerns they may have regarding slavery, forced labour, child labour or human trafficking in our business or supply chains.

Employment

Our recruitment processes comply with UK, US and Bermudian employment legislation, and we ensure that 'right to work' document checks and contracts of employment are in place for both permanent and temporary employees.

Our Assessment

In 2023, we continued to outsource recruitment to a third party. Our agreement with this third party has full modern slavery provisions and the third party in turn continues to have robust policies and procedures in place to counter slavery, forced labour, child labour and human trafficking.

We have further reviewed our spend data to assess the number of suppliers, their location and the nature of the goods or services being provided, in order to assess which suppliers represent the greatest risk to managing slavery, forced or child labour and human trafficking in our supply chain. For those higher risk suppliers, we have reviewed their policies and statements to ascertain that they are ensuring compliance with the requirements of the Act.

Our tender template includes a statement that Aspen is committed to ensuring slavery, forced labour, child labour and human trafficking do not exist in our business or supply chains. Bidding suppliers are required to include their relevant policies and procedures as part of their tenders.

Our standard purchasing terms require that a supplier must comply with the provisions of the Act in relation both to its direct employees and to its suppliers and to ensure that neither it, nor its supply chain, makes use of slavery, forced or bonded labour, child labour or human trafficking, or engages in unfair business practices pertaining to labour standards such as safe and secure workplace, working hours and wages, freedom of association.

In 2023, we continued to hold global outsourcing agreements with three Indian-based suppliers for the provision of a range of back and middle office services, including IT. As suppliers to the Aspen group, their services also encompass our global and Branch operations. The evaluation of the suppliers includes a full assessment of their approach to modern slavery, forced labour, child labour and human trafficking, as well as their ethical and social policies. This includes reviews of the organisations' United Nations report based on the Global Reporting Initiative, covering the organisations' approach to issues such as human rights practice, ethical supply chains and operating ethically. The agreements with the suppliers contain a range of clauses to prevent and detect modern slavery, for example, clauses covering the Act, minimum wage obligations and extensive audit rights. We have undertaken several site visits to the organisations' delivery locations since the inception of the agreements in 2018 and these visits have continued after signing of the agreements.

Due Diligence

Aspen has a procurement procedure in place for onboarding new suppliers. The new supplier onboarding process includes an assessment of the organization and its policies, which includes checking to see the organization has a modern slavery statement or equivalent policy in place.

The Procurement team has also set up a process to review suppliers on an on-going basis, which will include a review to see if there is an annually updated modern slavery statement or equivalent policy in place.

A process is also in place to assess the situation of the supplier should we be notified, or become aware, that the supplier is in breach of the regulations by non-compliance with the requirements.

Any potential breach is deemed a serious allegation and will be immediately escalated to Senior Management and could potentially result in the contract for the Supplier being terminated.

Awareness and training

All Aspen employees have been made aware of the Acts, the changes to our policies and the commitments these represent. More in-depth training has been given to our Procurement team and to key spending departments. Ongoing training will be given to those departments where we believe there is a direct connection to the potential exposure to modern slavery, forced labour, child labour and human trafficking in order that they are aware of what to look for and feel comfortable in reporting any such potential issues. All new employees to Aspen will be provided with a copy of this Statement as part of their “New Starter” package so that they are aware that Modern Slavery, forced labour, child labour and Human Trafficking will not be tolerated within our operations.

Performance indicators

Aspen has a number of key performance indicators to measure the performance of anti-slavery actions within Aspen which includes mandatory training and awareness of staff on modern slavery issues, supply chain verification when onboarding new suppliers and a Whistleblowing Policy under which employees can report any issues or concerns they may have regarding slavery, forced labour, child labour or human trafficking in our business or supply chains.

Consultation Process

In developing the 2023 modern slavery statement, the Australian Branch of AIUK worked in consultation with AIUK Head Office and other entities within the Aspen Group to assess and address modern slavery risks within the Group. This Statement has incorporated the outcome of those discussions.

Approval of this statement

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 (UK), the Modern Slavery Act 2018 (Australia) and the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) and constitutes the slavery, forced labour, child labour and human trafficking statement for the financial year-end 2023. This statement was approved by the Board of Aspen Insurance UK Limited.



Sarah Stanford
CEO, Aspen Insurance UK Limited
June 2024

