



## **Modern slavery and human trafficking**

This Statement is made on behalf of TT Club Mutual Insurance Ltd ("TT Club") (Australia Branch) pursuant to the Modern Slavery Act 2018 (Australia).

### Our Business

TT Club is the leading provider of insurance and related risk management services to the international transport and logistics industry. From the world's largest logistics businesses to individual transport operators, it provides quality tailor-made cover for its members. As a mutual insurer it is regulated in the UK by both the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA), and in Australia by the Australian Prudential Regulatory Authority (APRA).

The Club has no employees and has a limited supply chain. The management of the Australia branch is outsourced to Thomas Miller (Australasia) Pty Ltd, a company managed by Thomas Miller (TM) and Thomas Miller employs all the staff that are deployed on the Club's business.

### Our Policies

The TT Club has an obligation to prevent slavery and human trafficking and this obligation in part is met through Thomas Miller's Risk Management Framework which contains a range of relevant policies and procedures. The Club expects the same high standards as it imposes on itself from the third party suppliers with which it engages to ensure that there is no modern slavery or human trafficking in the supply chains of which they are part and which ultimately serve the Club.

Through the Managers, Thomas Miller, the Club has procurement procedures in place for professional services and also for goods and services other than professional services, where the requirements of the Modern Slavery Act are mandated when considering the suitability of potential suppliers. Relevant policies are:

- TM Procurement Policy for Professional Services
- TM Procurement Policy for Goods and Services other than Professional Services
- TM Employee Handbook
- TM Recruitment Policy
- TM Remuneration Policy
- TM & TT Conduct Risk Policies
- TM & TT Outsourcing Policies
- TM & TT Risk Management Frameworks
- TM & TT Whistleblowing Policies

Thomas Miller has a number of overseas offices which serve the Club's business (including Thomas Miller (Australasia) Pty Ltd. The approach to employment and to the use of third parties is the same in those offices as in the UK, except where local regulations stipulate differently.

### Due Diligence

TT Club has a dedicated Risk and Compliance function led by the TT Club Australia Branch Chief Risk Officer and supported by, among others, the Human Resources department. There are in place general systems and controls as follows;

- The selection and management of suppliers, including service evaluation and review, are governed by the procurement policies identified above.
- The Outsourcing Policy provides guidance on the assessment of options for outsourcing material activities to third parties which includes a detailed specification of the due diligence review performed on the chosen service provider and the requirement for a written agreement and ongoing oversight.



- Recruitment methods and standards for potential suppliers are also articulated in the procurement policies.
- Employee rights and responsibilities are set out in Contracts of Employment, the Employee Handbook and other related employment documentation. The established conduct standards ensure we conduct our business responsibly, ethically and in accordance with applicable laws and regulation.
- There are procedures in place to protect whistle-blowers.

#### Training

TT Club (Australia branch) through its Managers has communicated this Statement to all existing employees and communicates it to all new employees, to ensure a high level of understanding of the risks of modern slavery and human trafficking. We also consider the need for training of key employees to recognise the signs associated with modern slavery and what to do if they suspect these offences are being committed.

*This statement was approved on 28 June 2021 by Phillip Emmanuel in their role as principal governing body of TT Club Mutual Insurance Ltd ("TT Club") (Australia Branch) and who is the Senior Officer Outside Australia appointed by the Board of Directors under the regulatory governance requirements of TT Club Australia Branch's regulator, the Australian Prudential Regulation Authority (APRA) applicable to a Category C insurer and with whom the responsibility for overseeing TT Club Australia Branch's operations is placed by APRA.*

A handwritten signature in black ink that reads 'Phillip Emmanuel'. The signature is written in a cursive, flowing style.

Phillip Emmanuel

Senior Officer Outside Australia  
TT Club Australia Branch

Date: 28 June 2021