

Modern Slavery Act Statement

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015.

It sets out the steps that Canopus Managing Agents Limited, Canopus Services Limited and Flectat Limited have taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

Between May 2014 and March 2018, the Canopus Group was owned by Sompo Japan Nipponkoa Insurance Inc. In March 2018, Canopus Group was acquired by a private equity consortium led by Centerbridge Partners LP. The parent company of the Canopus Group, Canopus Group Limited, is domiciled in Jersey. The Canopus Group operates in the UK, Ireland, the Netherlands, Switzerland, Bermuda, the US and Singapore.

Canopus Group provides global specialty lines of insurance and reinsurance with a major presence in Lloyd's of London (the specialist insurance market provider). Canopus Managing Agents Limited is a Lloyd's managing agent which manages Lloyd's Syndicate 4444. Canopus Services Limited is a UK service company and Flectat Limited is a Lloyd's corporate member. Canopus Group financial year-end is 31 December.

Our approach

In the UK, Canopus Managing Agents Limited is regulated by Lloyd's of London, the Financial Conduct Authority and the Prudential Regulatory Authority. As a Group with companies regulated in the UK and elsewhere, we always work to the highest professional standards and comply with all laws and regulations applicable to our business. We expect the same high standards from those parties we engage with and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains.

Risk

We work to embed a robust risk management framework throughout our operations to ensure we effectively analyse and manage the risks to our business. Whilst we believe that there is a low risk of slavery and human trafficking being connected with our business, our risk management processes include analysing the risk of inadvertently working with suppliers who do not share our commitment to anti-slavery and human trafficking.

Policies

Canopus Group policies include:

- HR policies and procedures including checks undertaken when on-boarding new staff, Business Standards and Conduct policies and Health & Safety procedures
- Compliance policies including Anti-Bribery and Corruption, Money Laundering and Whistleblowing
- Policies which set out requirements for contracting with third parties
- Corporate Governance and Responsibility policy
- Internal Audit policy

These policies apply to all staff. They set out our expectation of the standards that our business should adhere to and the checks we undertake to ensure compliance with such standards.

In the course of 2018, we developed a Procurement policy which includes requirements to check suppliers are complying with legal and ethical practices including anti-slavery legislation.

Supplier due diligence

Our suppliers provide a wide range of products and services that are required to maintain and support our business operations. As a specialist provider of insurance and reinsurance, our supply chains are not ones that would normally be associated with slavery or human trafficking. Our suppliers are partners in our business success and they are expected to comply with all local laws and regulations. We routinely request information concerning, amongst other things, health and safety, environmental, equality and anti-corruption to enable us to verify their commitment to our corporate values and company policies.

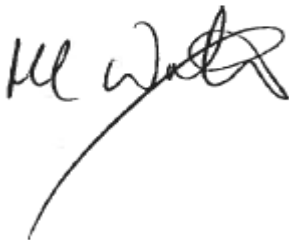
Whistleblowing

We encourage workers and external parties to report their concerns about any malpractice at the earliest possible stage. Any reportable concerns can be made directly to the Canopus Whistleblowers' contact, Peter Hazell (email whistleblowing@canopus.com).

Training

On-boarding training is provided to all new joiners that includes training on our anti-bribery and corruption, anti-money laundering and whistleblowing policies. This training is provided biennially to all staff.

This statement was approved by the board of Canopus Managing Agents Limited on 20 August 2019.



Michael Watson
Chairman and CEO of Canopus Group Limited

Published on behalf of Canopus Managing Agents Limited and the following UK entities:
Canopus Services Limited and Fleclat Limited