

# Modern Slavery Act Statement

This statement sets out the steps that the Canopus group has taken to seek to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

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, Singapore and Australia.

Canopus group provides global specialty lines of insurance and reinsurance with a major presence at Lloyd's of London (the specialist insurance market provider). The group's financial year-end is 31 December.

## Our approach

In the UK, Canopus Managing Agents Limited ("CMA") is a managing agent at Lloyd's of London. Both CMA and Lloyd's of London are regulated by the Financial Conduct Authority and the Prudential Regulation Authority. CMA manages Lloyd's Syndicate 4444, 1861 and 44. Canopus Services Limited is a UK service company. Flectat Limited and Flectat 2 Limited are both Lloyd's corporate members.

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 with whom we engage 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 directly 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

In February 2019 we developed a Procurement Policy which includes requirements to check suppliers are complying with legal and ethical practices including anti-slavery legislation. In October 2019 the Fitness and Propriety policy was created and this applies to all Canopus group employees.

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

## 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.

## 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](mailto:whistleblowing@canopus.com)).

## Training

On-boarding training is provided to all new joiners and this includes training on our Anti-Bribery and Corruption, Anti-Money Laundering and Whistleblowing policies. This training is provided biennially to all staff. This also includes Conduct Rules training which is required under the FCA's Senior Managers and Certification Regime.

In the course of 2019, Anti-Slavery training has been delivered by the Group Legal department for the Anti-Slavery Working Group which includes stakeholders from across the business.



Michael Watson  
For and on behalf of Canopus group  
Chairman and Chief Executive Officer

30<sup>th</sup> June 2020

Published on behalf of Canopus Managing Agents Limited and the following UK entities: Canopus Services Limited, Flectat Limited and Flectat 2 Limited, pursuant to Section 54, Part 6 of the Modern Slavery Act 2015. This statement was approved by the respective boards on 30th June 2020.