

Modern Slavery Statement for 2018

Introduction

This statement is made pursuant to Part 6 Section 54 of the Modern Slavery Act 2015 (MSA). It sets out Covéa Insurance's commitment to preventing slavery and human trafficking and outlines our efforts and activities to mitigate the risk of slavery and human trafficking during the year ending 31 December 2018. This statement covers Covéa Insurance Plc, Covéa Life Limited, Covéa Insurance Services Limited and Sterling Client Services Limited, together "Covéa Insurance".

Organisation structure, business and supply chains

Covéa Insurance is an insurance group specialising in commercial, motor, property and protection insurance. Our supply chain consists of the provision of services and goods to support the delivery of insurance underwriting and claims services to our policyholders. Almost all of our business is in the UK, as are the vast majority of our suppliers.

Measures in Place

Various measures are in place to combat the risk of slavery and human trafficking occurring anywhere in our organisation or supply chain, including:

Policies

Policies which support our zero tolerance approach to modern slavery include:

- Code of Conduct and Ethics
- Diversity and Inclusion Policy
- Flexible Working Policy
- Respectful Workplace Policy
- Whistleblowing Policy
- Outsourcing Policy

People, training and awareness

We have robust policies for recruitment, including conducting "eligibility to work in the UK" checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

All employees are issued with an employment contract informing them of both their contractual and statutory rights, such as holiday pay, sickness pay and any other benefits to which they may be entitled.

All employees are paid at least the national living wage and we also ensure any recruitment or temporary staffing agencies that we use comply with all UK regulations and legislation.

Awareness of our policies is ensured through our induction programme for new joiners and a programme of online awareness training, to refresh knowledge and understanding and to highlight any changes. Online modules delivered in 2018 included coverage of the following:

- Employee Handbook
- Code of Conduct and Ethics
- Whistleblowing
- Financial Crime.

All employees were required to attest to the fact that they had read and understood the related policies and will uphold the standards required of them. We review and assess our corporate risk and regulatory training requirements annually.

Procurement and Outsourcing

We have internal policies in place designed to ensure that we operate in a legal, ethical and transparent manner. We conduct appropriate due diligence on our suppliers as part of the selection process including a risk assessment of the supplier. Appropriate controls and requirements to address any risks identified are included in contracts with suppliers that successfully pass our due diligence process.

Future plans

We will continue to assess, control and monitor our compliance with MSA and also ensure appropriate oversight, and regular review of our supply chain.



James Reader, Director

Covéa Insurance plc

Registered Office: Norman Place, Reading, Berkshire, RG1 8DA

Registered in England and Wales No. 613259

Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority No. 202277