

## Britannia Group

### STATEMENT ON SLAVERY AND HUMAN TRAFFICKING FOR FINANCIAL YEAR ENDING 20 FEBRUARY 2022

#### INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to all undertakings in the Britannia Group (“Group”).

#### STRUCTURE

The Group is made up of The Britannia Steam Ship Insurance Association Holdings Limited (“Britannia Holdings”), which has the controlling interest in both The Britannia Steam Ship Insurance Association Limited (“Britannia”) and The Britannia Steam Ship Insurance Association Europe (“Britannia Europe”).

Britannia Europe is the sole trading entity following a Part VII transfer of all assets and liabilities from Britannia on 20 February 2022. The Britannia Group outsources its day-to-day administration to the Managers.

#### BUSINESS ACTIVITIES

Britannia Europe is a mutual P&I Club providing P&I and FD&D cover to shipowners and charterers worldwide.

The firm is domiciled in Luxembourg, has significant operations in London, but also operates from offices in Piraeus, Copenhagen, Tokyo, Kobe, Singapore, and Hong Kong.

#### OUR SUPPLY CHAINS AND RISK ASSESSMENT

The Britannia Group and its Managers use suppliers that fall in to two categories:

1. Routine services are used for the maintenance and support of our worldwide premises operations, e.g. support staff for office maintenance or communications infrastructure; and,
2. Underwriting and claims services are supported by brokers, surveyors, lawyers, and correspondents, who act for Britannia's insured but can be appointed by Britannia's managers.

The Britannia group does not function as a producer, manufacturer or retailer of physical goods and has no supply chain in relation to such activities.

Having a supply chain that provides skilled services and requires open communication and free movement to operate makes the resources involved less prone to exploitation and so low risk of slavery or human trafficking.

Where the Britannia supply chain involves a location or the provision of a product, that increases the risk of slavery or human trafficking, additional due diligence is undertaken to counter the additional threat.

#### OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

“The Britannia Group and the Managers have a zero-tolerance position in respect of slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.”

The Britannia Group and the Managers operate a range of policies and procedures to identify and mitigate risks, including in relation to modern slavery or human trafficking. These include policies and procedures in respect of:

- Outsourcing

- Standards of Business Conduct
- Whistleblowing Policy and hotline
- Senior Managers
- Financial Crime
- Employee handbook

No instances of modern slavery or people trafficking have been reported through our Whistleblowing process.

## **OUR SYSTEMS AND CONTROLS – DUE DILIGENCE, MEASURING EFFECTIVENESS AND TRAINING FOR STAFF**

Britannia conducts risk based due diligence on new suppliers, which includes:

- References being taken to ensure that suppliers are reputable.
- Screening suppliers before appointment and ongoing, against adverse media and enforcement action in relation to slavery or modern trafficking; and,
- Contractual clauses that describe Britannia's slavery and human trafficking expectations.

One business relationship, not in Britannia's supply chain, was identified to have received adverse media in relation to their supply chain allegedly containing exploited workers. The circumstances of the allegation were sought from the third party and a full response was received on the controls and investment put in to place to counter slavery and poor working practices.

All employees were put through eLearning on Modern Slavery in March 2021, which is also required of all new employees. The risk from Modern Slavery has also been raised in face to face Compliance training of employees.

This statement was approved in respect of the financial year ending 20 February 2022 by the Britannia Europe Board of Directors on 17 May 2022.

A.J. Cutler

Chief Executive Officer

The Britannia Steam Ship Insurance Association Europe

17 May 2022