

# Anti-Slavery Policy

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## What is Slavery, and what is Slavery Risk?

The Modern Slavery Act 2015 ("the Act") defines the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. Lockton International Holdings Limited, its subsidiaries, and Lockton Re LLP, (together "Lockton"), as UK companies supplying goods or services and having an annual aggregate turnover in excess of £36m, are required to comply.

**Slavery**, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. The key element of slavery is the behaviour on the part of the offender as if he/she owns the person, which deprives the victim of their freedom.

**Servitude** is the obligation to provide services imposed by coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

**Forced or compulsory labour** is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily.

An offence of **human trafficking** requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

Together, and for purposes of this policy, the above are together referred to as "slavery".

Howsoever defined, slavery is an abhorrent practice and Lockton is committed to taking reasonable risk-based precautions to ensure that it is absent from Lockton's business and supply chains.

Slavery Risk from the perspective of Lockton is the risk of loss of reputation, legal action, financial loss and standing in the business community arising from a failure to comply with the law set out in the Act. Where required, specific risks will be captured but compliance will be managed via oversight of a Modern Slavery Policy and the subsequent control environment in the first, second and third lines of defence. The law requires us to

- Each financial year publish a slavery and human trafficking statement which must be approved by the board and signed by a board director;
- Publish the statement to its website (or a prominent link if applicable)

The statement must include information about the steps Lockton takes to ensure that slavery is not present in its own business and supply chain.

## **Statement of Risk Appetite**

Lockton has a zero tolerance of Slavery in all its forms. This means that Lockton has no appetite for causing harm to persons, damaging its reputation, being subject of legal action or incurring financial loss or standing in the business community arising from a failure to comply with the Law set out in the Modern Slavery Act. Lockton's policies, controls and procedures are designed to reduce risk to this level.

## **Application and Scope of this Policy**

This statement applies to all companies in the Lockton International Holdings Group, including all majority and minority interests globally. For the avoidance of doubt, it includes Lockton Companies LLP, Lockton Overseas Ltd and all subsidiaries. Unless noted, all companies in Lockton are required to abide by this policy.

## **Slavery Risk Assessment & Statement**

The purpose of the Slavery Risk Assessment is to identify possible sources of Slavery risk arising from Lockton's activities and to propose actions to ensure that Slavery risk remains within stated Risk Appetite.

The Risk Assessment;

- Will be performed annually by the Head of International Compliance;
- Will be overseen and approved by the board of LIHL, and;
- Completion of Actions will be monitored by the Risk & Control Committee

This risk assessment is undertaken by all Lockton Regional Chief Operations Officers on an annual basis. On completion of the Risk Assessment, Lockton will revise and publish its Slavery Statement. The Board of LIHL are responsible for the approval of the statement (and the statement will be signed by a board member).

## Lockton International Holdings Ltd - Anti-Slavery Statement Sept 2023

Slavery is an abhorrent practice and Lockton is committed to ensuring that it is absent from Lockton's own business and supply chains globally.

### Statement of Risk Appetite

Lockton has a zero tolerance of Slavery in all its forms. This means that Lockton has no appetite for causing harm to persons, damaging its reputation, being subject of legal action or incurring financial loss or standing in the business community arising from a failure to comply with the Law set out in the Modern Slavery Act. Lockton's policies, controls and procedures are designed to reduce risk to this level.

### Application and Scope of this statement

This statement applies to all companies in the Lockton International Group ("Lockton"), including all majority and minority interests globally. For the avoidance of doubt, it includes Lockton Companies LLP. Unless noted, all companies in Lockton are required to abide by this policy.

### How Lockton Combats Slavery

In order to combat slavery, Lockton

- Will adopt this policy and approve this statement.
- Has reviewed it's risk assessment to identify areas where the risk of slavery may be elevated. The outputs and actions will be presented to the Board of Lockton International Holdings Ltd. Lockton continues to consider itself to be at "Low" risk of slavery arising (meaning that it is unlikely or known that slavery is not occurring), but is not complacent and as a result of the risk assessment will continue to take sensible, risk-based measures designed to reduce risk to within stated appetite.
- Carries out checks in its supply chain (principally those involved in providing and distributing products to Lockton customers) to reduce the risk of slavery occurring; in particular, Lockton uses screening software to identify suppliers and other third parties who may have had convictions for (and allegations of) trafficking and similar offences. Further actions will be taken to require participants in our supply chains to attest to an absence of non-compliant activity; to sign agreements that require compliant behaviours; and to submit to checks and report failures to Lockton;
- Will investigate the provision of training materials for all Associates in the group and disseminate information on the requirements of this policy once approved, and;
- Will formally review performance against this policy annually.

Lockton welcomes questions from interested persons on this subject.

Signed and approved on behalf of the Lockton International Holdings Board:

Name:



Sam Clark, General Counsel

Date:

11/9/23

September 2023