



# Haven Insurance Company Limited's – Modern Slavery Act 2015 Annual Transparency Statement

For year ending: 31<sup>st</sup> December 2018

## 1. Introduction

This statement has been published in accordance with the United Kingdom's Modern Slavery Act 2015 ("MSA"). It sets out the steps taken by Haven Insurance Company Limited ("Haven") during year ending 31<sup>st</sup> December 2018 to prevent modern slavery and human trafficking in its business and supply chains.

While Haven is not a UK company, the company is committed to ensuring that no form of modern slavery takes place within its own operations or the supply chain. Modern slavery is defined as slavery, servitude, forced or compulsory labour and human trafficking.

## 2. About Us

Haven provides motor and household insurance within the UK and is authorised and regulated by the Gibraltar Financial Services Commission.

## 3. Supply Chain

Haven's supply chain includes insurance brokers, reinsurers, claims handlers, engineers, vehicle replacement providers, medical providers, repairers, salvage agents, windscreen repairers, and solicitors. The majority of our suppliers are in the UK and are therefore subject to the MSA.

## 4. Governance

Haven's internal policies include the Code of Conduct, Anti-Bribery and Corruption, and Fitness and Propriety. All policies reaffirm our expectation that staff act with honesty and integrity whilst complying with legal and regulatory requirements at all times. We will shortly be adding to our policies with an Anti-Slavery policy which will reflect our commitment to:

- Act with integrity and ethically in all our business relationships,
- Ensure our Board, senior management and employees at all levels are aware of the principles of the MSA,
- Implement and enforce effective processes and controls to ensure slavery and human trafficking is not taking place anywhere within our business or in our supply chains,
- Maintain fair recruitment procedures and conditions of employment, and;
- Encourage the reporting of any actions which may contravene the MSA.

## 5. Due Diligence

We have implemented an outsourcing policy which governs; the proposal process, contractual requirements, risk mitigation, and management of the supply chain.

We are dedicated to continue improving our approach to preventing modern slavery, therefore in 2019 we have committed to:

- Carrying out a supply chain review; incorporating anti-slavery clauses in to supply contracts and reviewing supplier MSA statements,

- Incorporating the risk of modern slavery into the current supply chain risk assessment, ensuring it is appropriately identified, assessed and mitigated,
- Completing a risk assessment on our operational framework, and;
- Incorporating annual reviews of internal anti-slavery practices, policies and the supply chain in our Compliance Monitoring Plan.

## 6. Risk Assessment

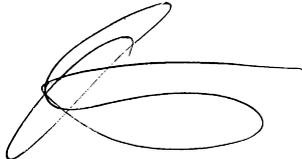
We have a risk management system in place which identifies, assesses, measures, monitors and manages risks the business is exposed to, or could potentially be exposed to. This is documented in Haven's risk register, risk profile, and risk appetite statements. We are developing our risk management system to further consider modern slavery, covering both our operational framework and our supply chain.

## 7. Training

Haven recognises that educating its staff is fundamental to ensuring that potential risks to human rights and modern slavery are identified and managed in a timely and efficient manner. In 2019 we will develop and deliver training on modern slavery to all staff. The training will ensure that staff understand the significance of the MSA and the importance of reducing the risk of modern slavery within Haven.

## Board Approval

The Directors of Haven Insurance Company Limited approved this statement on the 29<sup>th</sup> March 2019.



Christopher Lathey  
*Managing Director*