Charles Taylor plc - Modern Slavery and Human Trafficking Statement

Introduction
Charles Taylor plc and its subsidiaries (the “Group”) are committed to ensuring that their businesses and supply chain are free from modern slavery and human trafficking. This statement (made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”)) sets out the steps that the Group has taken during the financial year ended 31 December 2017 and will continue to take to meet this commitment. We intend to continue to review this statement annually.

Business and Organisational Structure
The Group provides a range of professional services to clients operating in the global insurance sector. It employs over 2,100 permanent and contract staff in 29 countries and 107 locations spread across the UK, the Americas, Asia Pacific, Europe, the Middle East and Africa. Charles Taylor plc, the parent company of the Group, is listed on the main London Stock Exchange.

Policies
The Group has policies and procedures in place designed to ensure that its businesses, and those of its suppliers, are conducted ethically and in accordance with all applicable laws. These include policies and procedures relating to Anti-Bribery and Corruption, Anti-Money laundering, Sanctions, Share Dealing, Procurement and Whistleblowing.

The Group is enhancing and strengthening these policies and procedures and implementing and enforcing more effective systems and controls across its businesses to ensure that they are followed. The aim of this is to ensure that those businesses and their supply chains are free from modern slavery and human trafficking.

Supply Chain
The Group’s supply chain mainly comprises property and technology-related suppliers, as well as providers of professional services to support the Group’s client-facing activities. The Group and its suppliers do not typically engage in activities relating to manufacturing or natural resources. As such, we believe that the Group’s supply chain poses a lower risk of slavery and human trafficking than that of companies operating in many other sectors; however, some risk does exist and the Group is committed to assessing and mitigating this risk.

The Group has reviewed the supply chain relating to its main areas of spend and geographic markets in order to ensure appropriate levels of service and commercial terms and to minimise the risk of modern slavery, human trafficking and other unethical behaviour. The Group has taken and is taking measures to mitigate these risks going forward. This includes:
(a) centralising procurement under the relevant functional area (e.g., technology, property, legal, HR) to enhance oversight and ensure best practice standards are fully embedded; and
(b) strengthening its existing policies and procedures both for engaging new suppliers and monitoring existing suppliers in order to make every effort to ensure that they meet both the requirements of the Act and the ethical values expected of them by the Group.

Going forward, the Group intends to fully embed these measures across its businesses and build in additional measures, such as more robust contract terms and enhanced supplier due diligence, so as to ensure appropriate oversight of the Group’s supply chain is maintained.

**Employees**
The Group’s commitment to compliance with the Act applies equally to its own staff. Through its selection, recruitment, induction and training procedures and programmes, the Group aims to ensure that the people it employs are not subject to modern slavery and human trafficking and are afforded the rights and protections that they are entitled to by law.

The Group intends to provide additional training to its staff to raise awareness of the risks of modern slavery and human trafficking and remind staff of the ethical standards which they are expected to adhere to. Where appropriate, the Group may consider extending this training to members of its supply chain.

The Group’s Whistleblowing Policy encourages staff to report concerns they may have about the Group’s compliance with applicable laws and/or breaches of its own ethical standards, without fear of retaliation.

This Statement will be communicated to all staff as has been done with previous versions of the statement.

**Governance**
The Group intends to identify meaningful indicators and assurance activity with which to monitor compliance with the requirements of the Act. These will be reported to the Group Assurance Committee, which is responsible for overseeing compliance with all the Group’s policies and procedures.

Where considered appropriate, the Group Assurance Committee will be responsible for ensuring that additional measures are developed and implemented to ensure continued compliance and address any concerns that arise.

Approved by the Board of Directors and signed by:

Mark Keogh  
Group Chief Financial Officer  
19 April 2018