



Liberty
Specialty Markets

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

for and on behalf of
Liberty Specialty Markets

Liberty Specialty Markets is proud of the conditions of employment for all of its staff.

We take appropriate steps to ensure the fundamental human rights of everyone who works for Liberty Specialty Markets (LSM) are respected and anyone we do business with upholds these principles.

Given the nature of their business, the LSM boards and management teams consider that there is minimal risk that either within LSM or via the limited supply chains

which support its business activities, LSM is in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking.

This statement details policies, processes and actions we have taken to ensure that modern slavery and human trafficking do not take place in our supply chains or our business.

Our values:



Put people first

Act with empathy, dignity and respect



Act responsibly

Do what's right and follow through



Keep it simple

Be clear and transparent



Make things better

Be proactive and challenge the status quo



Be open

Engage with all people and possibilities

Our Culture

– Statement on Human Rights

As part of Liberty Mutual Insurance Group, we believe progress happens when people feel secure. Our purpose, to help people embrace today and confidently pursue tomorrow, is at the core of all we do. As a global employer Liberty Mutual is committed to internationally recognized human rights principles and standards as defined by the United Nations Universal Declaration of Human Rights and the UN Global Compact.

– Responsible Business Framework

Our vision for LSM is to act as a responsible business and a high performing financial services company. To this end we have committed to various principles of responsible business. We are committed to ensuring that responsible business considerations are at the heart of our decision making processes. We use a responsible business framework to guide our engagement with key stakeholder groups: our company, clients and communities.

Our culture, identity and values drive a consistent approach to responsible business.

– Supplier Code of Conduct

We conduct business in an honest and ethical manner with integrity and accountability in all the countries in which we operate.

We require our suppliers to attest to our Supplier Code of Conduct (the Code), which reinforces our values and our expectations of our suppliers. The Code covers topics including business integrity and compliance, human rights, diversity and inclusion, environmental practices, health and safety, data management and privacy, and conflicts of interest.

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– Modern Slavery and Human Trafficking Policy

We are committed to ensuring that human trafficking and modern slavery do not exist in the supply chains in any part of our business. We have and will continue to maintain a zero tolerance policy in respect of modern slavery and human trafficking.

– Anti-Bribery & Corruption Policy

We are committed to the highest standards of third party bribery and corruption prevention. This is reflected in our diligence procedures which have been enacted to ensure that we conduct business in a fair, honest and open manner, and in compliance with all local and international anti-bribery and corruption laws.

– Whistleblowing Policy

Any LSM employee or related third party may escalate issues at any time via the Whistleblowing procedure as defined in the Whistleblowing Policy. Individuals who raise concerns in good faith or who assist, cooperate or testify in such an investigation or legal proceeding are protected from retaliation.

– Diversity, Equity & Inclusion

Our Inclusion Matters framework supports our commitment to strengthen our diverse workforce and grow our inclusive environment. We believe that recognising, appreciating and applying the unique perspectives of each person is the cornerstone of a high performing company. Inclusion is at the heart of how we do business and live our values each day.

We continue to invest in activities to create a strong sense of belonging across our global business.

Modern Slavery - Our Supply Chain

– Due diligence processes and risk assessment method

We understand the importance of taking effective steps to ensure human trafficking and modern slavery are not tolerated at any level of business.

We use rigorous due diligence processes based on risk factors to help identify potential suppliers (including coverholders and delegated claims administrators) and prioritise suppliers who hold values similar to those of LSM, insisting on zero tolerance for modern slavery and human trafficking. We have also heavily invested in new processes to better manage stakeholder due diligence at the pre-engagement stage to further our commitment to responsible business.

Identification and analysis are of paramount importance. The following steps and procedures are designed to identify and assess areas of risk and ensure that all areas of our business comply with our values:

- Any material and high risk supply chains, delegated claims administrators and coverholders are asked to confirm compliance to ensure that they do not assist, contribute or actively participate in modern slavery and human trafficking. We have recently approached many suppliers and contractors identified in key risk areas to remind them of our expectations in this area. We will continue this process regularly throughout the supplier engagement lifecycle.
- We reserves a right to audit any material or high risk supplier, contractor or TPA.

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We use rigorous due diligence processes based on risk factors to help identify potential suppliers (including coverholders and delegated claims administrators) and prioritise suppliers who hold values similar to ours, insisting on zero tolerance for modern slavery and human trafficking.

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Modern Slavery - Our people

Training

All of our employees across the UK and EMEA receive awareness training and information on modern slavery on a regular basis.

The provided training highlights the continued plight of millions of victims across the globe and educates employees to identify and combat risks of modern slavery and human trafficking in our business. This reinforces our zero tolerance approach to this important issue.

Effectiveness

We are confident in our rigorous processes that support our zero tolerance approach to modern slavery. As part of combatting modern slavery and human trafficking effectively, we bring this statement to the attention of all our employees.

At the start of their employment at LSM, all employees are required to read this statement as part of their induction.

This statement has been made pursuant to the obligations arising under section 54(1) of the Modern Slavery Act 2015. This statement should be considered to constitute the slavery and human trafficking statement for all UK operations (UK companies and UK branches of non-UK companies) within the Liberty Specialty Markets Group as further detailed below.



Philip Hobbs

President and Managing Director
For and on behalf of Liberty Specialty Markets

Date: 06/06/2022

Liberty Specialty Markets (LSM) is part of the Global Risk Solutions division of Liberty Mutual Insurance Group. LSM is the trading name for Liberty Mutual Insurance Europe SE (Company number: B232280, Grand Duchy of Luxembourg) (LMIE), Liberty Specialty Markets Europe S.à r.l. (Company number: B216199, Grand Duchy of Luxembourg) (LSME), Liberty Specialty Markets Two S.à r.l. (Company number B236925, Grand Duchy of Luxembourg) (LSME2), Liberty Managing Agency Limited (Company number: 03003606) (LMAL), Liberty Specialty Services Limited (Company number: 04845458) (LSSL), Liberty Corporate Capital Limited (Company number: 02993038) (LCCL), Liberty Corporate Capital (Two) Limited (Company number: 0660334) (LCCL2), Liberty Specialty Markets Limited (Company number: 09023400) (LSML) and Liberty Specialty Markets MENA Limited (DIFC Licence No 1794, DIFC) (LSMM). For the purposes of this statement, "LSM" also includes Liberty UK and Europe Holdings Limited (UKH). LSM provides insurance and reinsurance products and services in various jurisdictions.

For more details please visit www.libertyspecialtymarkets.com