

Modern Slavery Act Transparency Statement

TRAVELERS EUROPE

Travelers Europe has zero tolerance of slavery and human trafficking. We are committed to taking appropriate steps to ensure that slavery and human trafficking does not occur in any part of our business or our supply chains.

Purpose of this statement

This statement is made on behalf of Travelers Management Limited, Travelers Insurance Company Limited, Travelers Syndicate Management Limited and Travelers Underwriting Agency Limited (together, “Travelers Europe”) and sets out the steps that Travelers Europe is continuing to take to ensure that slavery and human trafficking is not taking place in any part of its business or its supply chains.

About Travelers Europe

Travelers Europe offers customers a wide range of commercial insurance covers through Travelers Insurance Company Limited, which underwrites general insurance business from various locations in the UK and Ireland, Syndicate 5000 at Lloyd’s, which underwrites specialist insurance globally and is managed by Travelers Syndicate Management Limited, and Travelers Underwriting Agency Limited, which operates as an underwriting agent. Travelers Management Limited is a service company which employs approximately 600 staff in the UK and Ireland, and provides the services of such staff and other services to the companies within Travelers Europe. All of these companies are incorporated in England and Wales.

The Travelers Companies, Inc., incorporated in Minnesota, USA, is the ultimate parent of the companies within Travelers Europe. It is a leading provider of property liability insurance for motor, home and business. A component of the Dow Jones Industrial Average, the Travelers group has approximately 30,000 employees and more than 150 years of experience in the industry.

Supply chains

Our suppliers are businesses which supply certain services and products to support our core insurance business (the outsourcing of ancillary data entry and software development), the running of our offices (cleaning, security and maintenance services) and our IT infrastructure (supply and maintenance of systems, software and equipment).

Supplier due diligence

Services and products are procured in accordance with our Procurement and Vendor Contracting Policy, which ensures that we enter into supplier arrangements knowingly and with appropriate levels of review and approval. The ongoing monitoring and oversight of our supplier arrangements is carried out in accordance with our Supplier Management Policy.

In addition, we assess and record the likelihood of the existence of modern slavery within each of our supplier relationships. Where we have identified a particular risk, we undertake enhanced due diligence by asking specific questions of the suppliers’ staff and management during site visits regarding their terms of employment and their working environment. In addition to our existing contractual provisions that require suppliers to adhere to local employment laws, we continue to incorporate provisions into the supplier contracts regarding compliance with the Modern Slavery Act 2015 (the “Act”), where appropriate.

Policies

We require all employees, officers and directors to comply with our Code of Business Conduct and Ethics, which reflects our commitment to conduct business with honesty, integrity, and accountability. This is reinforced by various policies including the Whistleblowing and Non-Victimisation Policy, which encourages employees to report concerns about any conduct they believe to be unlawful, fraudulent, or unethical. We also provide an Ethics Helpline (administered by an independent third party provider) that can be used to disclose ethical concerns with guaranteed anonymity if requested.

Raising awareness

This statement will be communicated to all employees. Those individuals within Travelers Europe responsible for managing higher risk suppliers have been reminded of the requirements of the Act.

Further steps

During the next financial year, we will continue to identify, assess and manage risks on an ongoing basis. As part of that process, we will gather information from suppliers during the procurement and audit processes regarding their awareness of, and compliance with, the Act, and will ensure that appropriate contractual provisions are incorporated into supplier contracts.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Travelers Europe's anti-slavery and human trafficking statement for the financial year ending 31 December 2018. This statement was approved by the board of directors of Travelers Management Limited and Travelers Underwriting Agency Limited on 1 August 2019, and Travelers Insurance Company Limited and Travelers Syndicate Management Limited on 25 April 2019.



Michael Gent, CFO

TRAVELERS EUROPE

