

## **Charles Taylor plc & Subsidiaries Modern Slavery and Human Trafficking Statement June 2019**

CEGA Group Services Ltd is a wholly owned subsidiary of Charles Taylor plc (the ‘Group’ or ‘Charles Taylor’). CEGA complies with the Group standards in relation to Modern Slavery and Human Trafficking, as set out below in the Group Statement which outlines a common consistent approach across Charles Taylor operations globally. CEGA operates as part of CT Claims Services.

### **Introduction and Scope**

Modern Slavery is a term used to encompass slavery, servitude, forced or compulsory labour and human trafficking. Modern Slavery is a crime and a violation of human rights. This statement is published by Charles Taylor plc and extends to all our wholly and majority owned entities within the Charles Taylor Group (the “Group” or “Charles Taylor”). Charles Taylor plc is a UK domiciled public company listed on the London Stock Exchange.

The statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (the “Act”). It sets out the Group’s approach, governance and actions to combat Modern Slavery in its various forms.

### **Commitment**

Charles Taylor is committed to upholding its responsibilities to our people, those we come into contact with, the communities in which we work and the environment. We maintain a high standard of business ethics. We respect and support the protection of human rights in all our business units irrespective of domicile or place of operation.

This commitment requires us to assess human rights risks in all our businesses and resulting from our operations, considering equality, corruption and bribery, child labour, forced labour, slavery and trafficking, non-discrimination, health and safety and working conditions.

### **Organisation, Markets and Structure**

The Group is a global provider of professional services and technology solutions to the insurance market. Insurance is a global business and the Group has offices located across the globe to provide services and solutions to our clients wherever they are needed. We operate through a number of business units organised under three areas: -

- **Charles Taylor Claims Services** – delivering loss adjusting, end-to-end claims programme management and related technical services that combine technical expertise, process efficiency and solutions to optimise claims outcomes for clients.
- **Charles Taylor Insurance Management** – offering end-to-end management of mutual insurers, captives, life insurers, Lloyd’s syndicates and other insurance programmes for capital providers, including the consolidation of international life business.

- **Charles Taylor InsureTech** – providing a full set of technology solutions for insurers, brokers, MGAs and insurance related affinity players which enable our clients to transform their operating models and customer experience.

The Company operates globally in 120 locations in 30 countries. Full details of our office network can be found at [www.ctplc.com](http://www.ctplc.com).

## Governance

The Board of Directors of Charles Taylor plc is responsible for the Group's overall strategy and business model. It sets the tone from the top for how we do business. The Executive Committee draws its members from three areas of Group management: Executive Directors (of the plc), senior executives with management responsibilities for individual trading businesses, and representatives of Group functions such as legal, human resources and corporate development.

The Group Corporate Development & Operations Director (Richard Yerbury) is responsible for meeting the standards set out in this statement.

The Group's risk management framework and processes, which are designed to identify, evaluate and manage the risk of the Group not achieving its business objectives or incurring losses, are outlined in the 'How We Manage Risk' section of the 2018 Annual Report and Accounts. The key aspects of the Group's control activity in relation our various legal, regulatory and policy-related obligations are as follows:

- Policies that apply to our operations and our people, outlining the standards and specific behaviours that we expect;
- Communication and training on our policies and on specific areas of risk;
- Risk assessment to understand our exposures and to assess our controls;
- Reporting of our control activity and any issues to the relevant governance forums;
- Whistleblowing procedures to ensure that all staff can highlight failures to meet policies or regulations;
- Public Disclosure of our control framework and of our approach to specific issues or obligations (e.g., Gender Pay, Modern Slavery).

The application of each of the above areas of control activity to the area of Modern Slavery and Human Trafficking is outlined below.

## Our Policies relating to Modern Slavery and Human Trafficking

The Group has a comprehensive set of policies which apply to all Charles Taylor operations irrespective of where they are based or deployed. We review our policies on a regular basis (at least annually) to ensure that they remain fit for purpose. Our policies relate to the Group's relationships with our staff and those who come into contact with the Group; they support the promotion and maintenance of a consistently high standard of business ethics. An overview of how we approach corporate responsibility matters is set out in the 'Acting Responsibly' section in our 2018 Annual Report which is available on our website. The policies that are relevant to our ongoing efforts to avoid Modern Slavery and Human Trafficking within our operations are as follows:

- **Our Corporate Values** – sets the overall tone for what is expected of Charles Taylor operations.

- **Ethics Statement** – explains the ethical behaviours expected of all Charles Taylor staff.
- **Equal Opportunities** – outlines measures to ensure that Group staff are treated fairly and without discrimination.
- **Health and Safety** – communicates how we manage the safety and wellbeing of our people and those that come into contact with us.
- **Privacy and Data Protection** – describes our approach to protecting the data we hold, including our own data and information that is entrusted to us by others.

## Communication and training

The Group utilises several conduits to ensure that our standards and policies are communicated to – and understood by – our people. Policies are communicated to staff on joining, with acknowledgement of being read and understood required as a key part of the induction programme. Mandatory training takes place annually for certain areas. This is monitored across the Group and compliance reported to the management team. There is ongoing communication via e-mail and regular briefings and seminars for the relevant people on specific topics. Our policies and procedures are available on our Group intranet, Compass, to all staff, and are communicated pro-actively as appropriate (for example, when they are updated) to all staff by e-mail.

## Risk Assessment

**Overall:** we continually assess our exposure, and the potential for exposure, to risks and have a control and reporting framework to communicate issues (further details of our control framework are available in the Risk and Audit Committee sections of the 2018 Annual Report). This includes an assessment of the risk of our operations utilising or being complicit in slavery and trafficking activities. We have assessed that this risk is low. As a provider of professional and technical services, we are not a direct manufacturer or supplier of goods. Our staff generally have a high level of technical capability and professional qualification.

**Risk assessment of our Supply Chain:** our supply chain does not have a need for a high degree of manufacturing or a labour-intensive resource. Our main exposure for potential slavery and trafficking risks exists through the maintenance and support of our IT and property-related infrastructure. Our risk assessment in December 2018 showed a low level of risk within our IT procurement, through the use of and relationships with major vendors who have committed to similar levels of adherence to the Act as our own. It also showed a low level of risk in property-related procurement, through ensuring that companies involved in the supply, fit-out and maintenance of our office space adhere to suitable standards for their respective workers. More generally we ensure all contracts with our supply partners include clauses covering compliance with the Act. For certain services or projects, which have a potential for additional exposure, a specific and full risk assessment is carried out.

## Reporting

A number of group functions have a direct role in compliance with the law, regulation and our own standards. These include our Risk & Compliance teams, Internal Audit, Legal and Human Resources. Individual teams within our client facing businesses are also responsible for ensuring compliance by working within our standards. Each of these teams are responsible for making risk assessments and reporting any exposure or incidents of non-compliance, including in relation to our Modern Slavery and Human Trafficking obligations.

No issues of non-compliance with our Modern Slavery and Human Trafficking obligations were reported by our various control functions during 2018, or in prior years.

## Whistleblowing

The Group encourages members of staff to maintain high standards of behaviour and to report any wrongdoing that falls short of this fundamental principle. Our Whistleblowing Policy aims to ensure that any member of staff who raises concerns in good faith can do so on a confidential basis without fear of reprisal or victimisation, and in the knowledge that their concerns will be taken seriously and investigated appropriately. The Policy applies to all employees of the Group acting in any capacity, executive and non-executive directors, officers, secondees, people on work-experience, contractors, authorised representatives and consultants in all Charles Taylor's business units, divisions and subsidiaries globally.

No issues of non-compliance with our Modern Slavery and Human Trafficking obligations were reported via our Whistleblowing Procedures during 2018, or in prior years.

## Next Steps

Whilst we believe our exposure to risks relating to Modern Slavery and Human Trafficking are low, we recognise that all businesses have a duty to ensure that this topic receives continual and appropriate attention and that we remain diligent in our efforts to reduce slavery and trafficking in all its forms. We shall continue to assess our risks both internally and through interaction with our partners, both current and future.

Specific actions that are proposed over the next year are as follows:

- To continue to educate our management teams and staff to ensure that our controls and risk assessments meet the challenge of our high standards.
- To further develop the verification of the risks posed by our supply chain.
- To ensure our policies and training programmes remain appropriate.

**Approved on Behalf Of: -  
Charles Taylor plc & Subsidiaries**

**CEGA Group Services Ltd**

**Richard Yerbury**  
Group Corporate Development &  
Operations Director  
25 June 2019

**Alistair Hardie**  
Chief Executive  
25 June 2019

**Further Information on Charles Taylor can be found at [www.ctplc.com](http://www.ctplc.com)**

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