

North

Modern Slavery Act Statement

Date: 15 April 2020

Author: Group General Counsel

Controls and Approvals

Document Control

Document name	Modern Slavery Act Statement
Owner	Group General Counsel
Purpose and use	The UK Modern Slavery Act 2015 requires North, North EU and Sunderland Marine to publish an annual statement regarding Slavery and Human Trafficking. The statement must be approved and published on the companies' websites within 6 months of the end of each financial year.
Notes	

Document History and Approvals

Revision Date	Revised by	Purpose of Revision	Owner approval	Board approvals
15 April 2020	Group General Counsel	Addition of document control sheet and update for financial year ending 20.02.2020 for approval at May 2020 Board meetings	April 2020	North: 21.5.20 SMI: 20.5.20 North EU: 19.5.20

North Group
Statement on Slavery and Human Trafficking for
Financial Year Ending 20 February 2020

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to all undertakings in the North Group of companies (“Group”).

Group structure

The North Group is a global marine insurance group consisting of the North of England Protecting and Indemnity Association Limited (“North”) and its subsidiary companies, including Sunderland Marine Insurance Company Limited (“Sunderland Marine”) and North of England P&I DAC (“North EU”). North is the ultimate parent company of the Group and has its head office in the United Kingdom.

Our principal business activities

North and North EU are mutual marine insurance companies providing insurance cover to their members in respect of P&I, FD&D and War risks, and fixed premium marine insurance to the fishing and aquaculture industries.

Sunderland Marine provides fixed premium marine insurance to the fishing and aquaculture industries.

Our supply chains and risk assessment

We believe that there is a low risk of slavery and human trafficking occurring in our supply chains. Our key suppliers are those that support our insurance underwriting and claims handling activities, in particular reinsurers, suppliers of IT equipment and services and professional service firms such as brokers, loss adjusters, correspondents, surveyors, lawyers, accountants and actuaries.

Our values and policies in relation to slavery and human trafficking

We have a zero tolerance policy to slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our core values of teamwork, integrity and commitment emphasise the importance of acting ethically and lawfully in all our business relationships and implementing and enforcing effective systems and controls to ensure that activity such as slavery and human trafficking is not taking place anywhere in our supply chains.

Our systems & controls – due diligence, measuring effectiveness and training for staff

Due to the low risk nature of our supply chains we do not consider it necessary or proportionate to adopt a formal due diligence programme, supply chain compliance programme, staff training programme or performance indicators specific to risks of slavery and human trafficking. We do however have in place general systems and controls to:

- Identify and assess potential risk areas in our business.
- Mitigate risks to our business.
- Monitor potential risk areas in our business.
- Undertake due diligence in relation to material contracts and outsourcing arrangements.
- Establish and maintain conduct standards ensuring we conduct our business responsibly, ethically and in accordance with applicable laws and regulations.
- Protect whistle blowers.
- Promote corporate social responsibility recognising our wider social and environmental responsibilities.

We are satisfied that these systems and controls are reasonable and proportionate to the risks of slavery and human trafficking that exist within our supply chains and effective in ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This statement was approved in respect of the financial year ending 20 February 2020:

- by the North Board of Directors on 21 May 2020
- by the Sunderland Marine Board of Directors on 20 May 2020
- by the North EU Board of Directors on 19 May 2020

P.A. Jennings

Chief Executive Officer/Executive Director
The North of England Protecting and Indemnity Association Ltd
North of England P&I DAC
Sunderland Marine Insurance Company Ltd
21 May 2020