

# Modern Slavery and Human Trafficking Statement

## Modern Slavery Act 2015

Placing Platform Limited (PPL) is committed to being a responsible corporate citizen by adopting ethical principles and practices, sharing knowledge and expertise, and making a positive contribution to social and environmental issues.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. PPL has a zero-tolerance approach to modern slavery and we are committed to being a responsible business in all our dealings and relationships; this includes ensuring our business practices, systems, and controls are effective in combating slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for PPL's operations based in the United Kingdom

### Organisational structure

PPL is a limited liability company formed in 2016 to provide a market solution for the electronic placement of (re)insurance risks allowing brokers and insurers in the London Market to quote, negotiate and bind business electronically.

Our principal business address in the United Kingdom is 2 Minster Court, London, EC3R 7BB. PPL employs approximately 40 full time members of staff and is supported by a number of temporary staff at various times.

### Our policy on slavery and human trafficking

PPL is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chains. In light of the obligation to report on measures to ensure that all parts of our business and supplier network are slavery free, we have put in place a designated Anti-Slavery and Human Trafficking Policy.

Our Anti-Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supplier network.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have the following in place:

### Employees

We fully support the principles set out in the UN's Universal Declaration of Human Rights and the International Labour Organisation core labour standards. We respect the dignity and rights of each individual who works for us and with us. This also extends to the employees of suppliers working at our site, where we proactively seek to improve their living standards.

We have a comprehensive range of policies and practices that are in place including Equality & Diversity, Whistleblowing and formal Grievance and Disciplinary policies to protect and ensure that staff rights and responsibilities are upheld.

### Supplier Due Diligence

Our procurement process is managed in accordance with PPL's Procurement Policy and overseen by the office of the Chief Commercial Officer. This includes:

- Engaging with potential new suppliers as part of the tender vetting process, via a series of responsible business questions, to assess a supplier's position on human rights, environmental and social issues.
- Providing suppliers with the PPL Supplier Code of Conduct which sets out the standards of business conduct which all suppliers and any third-party sub-contractors should comply with, including: their responsible business approach, protection of human rights, diversity, and inclusion; environmental and health and safety practices.

To ensure all those in our supply chain (including contractors) comply with our values we have in place a supply chain compliance action list which includes:

- Engaging with the supplier base on a regular basis to secure a commitment to work with PPL to identify and monitor slavery and human trafficking down the supply chain.
- Registering all supplier responses on an annual basis.

### Our Progress

This year our approach to the implementation of the Modern Slavery Act 2015 (Act) has included:

- Publication of the PPL Anti-Slavery and Human Trafficking Policy and other related policies to all staff.
- Identification of areas within our training portfolio to further raise awareness of modern slavery and human trafficking.

### Next Steps

We will continue to review our supply chain policies and protocols, developing specific measures to ensure that our obligations under the Act are disseminated through our supply chain. These measures will include:

- Review our Supplier Code of Conduct and Third-Party Questionnaires to ensure they includes our zero-tolerance approach to human rights abuses.

- Work collaboratively with our supply chain partners to uphold high standards of conduct around safe working conditions, treating workers with dignity and respect and acting fairly and ethically.
- Create a supplier database that enables increased visibility and robust supplier screening, due diligence, and monitoring.
- Work collaboratively with key insurance market participants to share best practice and extend the responsible business network.

**APPROVED BY CEO AND CCO OF PPL**

**PPL CEO - JOHN MASON**

**DATE:**

**PPL CCO – AMIT ARORA**

**DATE:**