

SLAVERY AND HUMAN TRAFFICKING STATEMENT for the year ended 31 December 2022

Approved by the Board on 14 June 2023

Published June 2023

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ALOPUC Ltd (ALOPUC) and its subsidiaries (collectively called “Atrium”) slavery and human trafficking statement for the financial year ended 31 December 2022. It is reviewed annually.

ALOPUC’s business model and supply chain represent a low risk of exposure to slavery and human trafficking.

ALOPUC does not accept any breach of human rights including slavery and human trafficking, and its main trading subsidiary, Atrium Underwriters Limited “AUL”, operates under a code of business principles and ethics (“code”). The code is AUL Board approved and the Atrium statement is aligned with the principles set out in the code. As a business we raise awareness with our staff to be alert to the risk, however remote, that we might become party to either slavery or human trafficking in our business and in the wider supply chain.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We are seeking to ensure that there is no slavery or human trafficking, as defined in the Modern Slavery Act 2015, in Atrium’s supply chains or in any part of our business. AUL’s business principles and ethics statement reflect our commitment to acting ethically and with integrity in all our business relationships. We have implemented and enforce effective and proportionate systems and controls to ensure slavery and human trafficking is not accepted anywhere in our supply chains.

Organisational Structure

Atrium operates as part of a group of companies whose UK parent company is ALOPUC. We are based in London, and we have an office in the US. AUL is a long-established leading specialist insurance and reinsurance business, underwriting through Syndicate 609 at Lloyd’s. Our staff and services are all employed through a group company, Atrium Group Services Ltd (“AGSL”). ALOPUC, AUL, Atrium Underwriters Group Limited “AUGL” and AGSL are all covered by this statement.

OUR SUPPLY CHAINS

When considering our supply chains, we focus on those firms who we pay for provision of goods and services. We source our insurance business through a range of worldwide brokers and placement of business to the syndicate will usually involve a Lloyd’s broker. These brokers derive their income from the client (the (re)insured), as such we do not consider our brokers to be a part of our supply chain in this context. That said we will only deal with reputable firms who are regulated by a local insurance regulator. This regulation will typically include an assessment of their fitness and propriety.

We also underwrite (re)insurance business through Lloyd’s approved Coverholders located globally (most significantly in the UK, EU, US, Canada, Australia and South Africa). These firms act as our agents. As part of our due diligence performed when taking on a new coverholder we make an

assessment of the likely exposure to slavery and human trafficking in the countries in which they will operate and seek assurance where relevant.

For certain activities we retain outsourced service providers to administer our affairs (e.g. claims handling, loss adjusting, policy processing) or provide outsourced support functions (e.g. investment management). Our Outsourcing Policy recognises the need for an assessment of the risk of exposure to possible slavery or human trafficking and we require commentary on how this risk is mitigated as part of the due diligence process prior to approval of all service providers.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our supply chain assessment undertaken to identify and mitigate risk –

- We review our list of suppliers and outsourced providers and assess the risk they pose to our business
- We review our list of Coverholders and risk assess them by country focusing on those operating in countries where slavery or trafficking is seen as a significant risk and understand whether there is a potential for exposure

TRAINING

To ensure the risks of modern slavery and human trafficking in our supply chains and our business are understood by our staff, we provide training and raise awareness using our intranet. We also provide awareness training to new recruits during their induction period.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We are developing key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains but given the limited number of counterparties it may be more effective to consider each one individually.

James Lee



Executive Director, ALOPUC Limited