



Anti-Slavery Statement

Steamship Mutual Underwriting Association Limited (“Steamship”) is a mutual Protection and Indemnity Association, otherwise known as a P&I Club. Steamship specialises in liability insurance for shipowners and charterers worldwide, and is a member of the International Group of P&I Clubs.

Steamship has appointed Managers, Steamship P&I Management LLP (“SPIM”), who are responsible for the day-to-day handling of its claims, underwriting and financial business. Steamship and/or SPIM and its subsidiaries (“we”) have offices in Hong Kong, Limassol, London, Piraeus, Rio de Janeiro, Singapore, Tokyo, Bermuda and America.

We have zero tolerance of slavery and human trafficking, and are committed to acting ethically and professionally in our business dealings and relationships, and to implementing and enforcing effective systems to counter slavery and human trafficking. The presence of slavery or human trafficking in connection with Steamship business or any of Steamship’s supply chains is strictly prohibited.

We use suppliers falling into two broad categories:

1. Service providers of cleaning and maintenance, physical supplies and infrastructure for our offices worldwide;
2. Service providers supporting the provision of our core insurance products and ancillary services, including claims handling and underwriting, lawyers, brokers, financial advisors, IT service providers, and others.

We are not a manufacturer or retailer of physical goods and have no supply chains in relation to such activities.

We assess suppliers on the basis of their potential risk of modern slavery activities, looking at the nature of the services they provide, the jurisdiction(s) in which they are based, our spend with them, and whether or not they have published their own Modern Slavery Statement. Where appropriate, we ensure that contracts with suppliers include terms enforcing the obligations of those suppliers in accordance with the UK Modern Slavery Act and Steamship’s commitment to ethical business dealings. Where necessary (and mostly with respect to suppliers coming under

category 1, above), we conduct additional due diligence and request further information from the suppliers as to their activities and relevant policies and procedures. In most cases the skilled nature of the services provided by category 2 suppliers means we assess them as low risk.

We look at the risk of modern slavery in our supply chains both prior to engaging a supplier, and on an ongoing annual basis thereafter. We keep a register of our suppliers, and each supplier's risk assessment forms part of this. We do not use any external stakeholders to map our supply chains; this is done internally.

Our modern slavery risk management governance is undertaken by our Legal, Compliance, IT and Facilities teams working in concert with our overseas offices. The relevant policies require annual board-level reporting, including annual board approval of our Modern Slavery Statement, and cover the activities of all Steamship entities. Procedures are reviewed and updated periodically, and where we discover a risk that is not appropriately dealt with in our policies and procedures, or where applicable laws or relevant government guidance change, we update our policies and procedures as necessary.

These policies and procedures include:

- An Anti-Slavery Policy, which details Steamship's commitment to compliance with laws and regulations relevant to modern slavery, the publishing of Steamship's Modern Slavery Statement, and the requirements of board reporting;
- Anti-Slavery Due Diligence Guidelines, which provide details of Steamship's due diligence requirements when assessing our supply chains, the use of contractual terms with suppliers to enforce modern slavery obligations, and internal reporting procedures for staff;
- A Code of Business Standards & Ethics, which details Steamship's commitment to upholding high standards of professional and moral conduct and appropriate corporate governance in all aspects of our business, including modern slavery, and requires a zero-tolerance approach to all forms of financial crime including bribery and corruption;
- An Outsourcing & Third Party Arrangement Policy, which defines and provides guidance on Steamship's approach towards outsourcing arrangements, including the initial selection of, contracting with and monitoring of suppliers;
- Procurement Procedures, which provide detailed guidance on the process and due diligence for the selection and ongoing monitoring of suppliers; and

- A Whistleblowing Policy, which sets out the procedures and avenues for the disclosure of information, the integrity and independence of the whistleblowing process, and appropriate protections for anyone wishing to disclose information.

To maintain staff awareness and understanding of Steamship's ethical and professional approach to business, all staff are given periodic training on their individual and collective obligations under the Modern Slavery Act. Our internal policies and procedures are communicated to staff worldwide on an annual basis by our Compliance and Legal departments, and ad hoc updates are provided when any material changes are made. All staff are made aware of our Modern Slavery Statement each year following its approval by the Board.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Steamship's slavery and human trafficking statement until amended. It was approved by Steamship's Board of Directors on 26 May 2026, by SPIM on 28 May 2026, and covers the financial year ending 20th February 2026.

Jonathan Andrews, Chief Executive Officer, 26 May 2026.
Steamship Mutual Underwriting Association Limited

Jonathan Andrews, Partner, 28 May 2026.
Steamship P&I Management LLP