The London P&I Club's Modern Slavery and Human Trafficking Statement

This **Statement** is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes The London P&I Club's Modern Slavery Statement and is for the financial year ended 20 February 2024.

Organisational structure, the Club's business and supply chains

The Club is a mutual P&I Club providing P&I, War Risks and FD&D cover to ship-owners and charterers worldwide. The Club provides claims handling and advisory services to its policyholders from its London, Piraeus and Hong Kong Offices, through the Managers (A Bilbrough & Co. Ltd) and a global network of correspondents.

The Club's supply chains include the supply of services, which encompass dealings with professional services providers such as the Managers, correspondents, auditors, lawyers, loss adjustors, and surveyors.

The Club's policies in relation to modern slavery and human trafficking

The Club has a zero tolerance policy in respect of slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in any part of its business, and where possible, in the Club or its Managers' suppliers. The Club also encourages its Members to implement a zero tolerance policy in respect of modern slavery and human trafficking.

The Club mitigates its modern slavery or human trafficking risks through its policies and procedures relating to:

- Employment of staff and directors
- Compliance
- Outsourcing
- Risk management
- Prevention of bribery and corruption
- Whistleblowing
- Claims handling

Risk Assessment

The Club only deals with professional firms, does not act as a manufacturer or retailer of physical goods and has no supply chain in relation to such activities. Non-professional services such as facilities management, in-house catering and cleaning services are provided to the Club's Managers in their UK, Greece and Hong Kong offices. The Managers are required to comply with the policies above. There is therefore minimal risk that the Club, or the professional firms which support its business activities are involved in, or complicit in, slavery and human trafficking.

The Club's due diligence and risk management processes in relation to slavery and human trafficking

The Club's Outsourcing Policy and related procedures provide guidance on the assessment of new third party service providers and details the due diligence processes

to be performed prior to their appointment and the requirement for a written agreement to be in place. Where a risk has been identified, we shall check the service provider has taken steps to prevent modern slavery and human trafficking in its supply chain and, where applicable, obtain a copy of the supplier's Modern Slavery Statement. In addition, the written agreement will be enhanced to include explicit terms to cover zero tolerance of modern slavery and human trafficking.

Training provided to Directors and staff

To maintain awareness and understanding of the Club's obligations in accordance with the Modern Slavery Act, all staff and Directors of the Club's Managers have been made aware of this Statement. Additionally, the Club's Whistleblowing Policy enables them to report any concerns they might have with the Club's compliance with applicable laws and ethical standards. Training on modern slavery and human trafficking has been provided to all staff, and annual reminders are issued. As part of their induction, all new staff must also undergo training on Modern Slavery and Trafficking. Guidance on this Policy Statement is also included in the Staff Handbook.

No additional actions have been identified for the forthcoming financial year and beyond.

The Club's Directors reviewed and approved this Statement at its 16 July 2024 Board meeting.

Signed by Anthony Jones, Director

17 July 2024