

TRC Modern Slavery Statement

Modern Slavery Statement made on behalf of Tindall Riley & Co Limited (TRC), its trading names, “Wren Managers” and “Griffin Managers” and its subsidiaries (together “Tindall Riley”).

STATEMENT BY THE CHAIRMAN OF TRC, ENDORSED BY TRC’S BOARD

TRC manages four Mutual Insurance Associations. Given the nature of our business, it is considered that there is minimal risk, either within TRC, Tindall Riley or the limited supply chains which support our business activities, that we are in any way involved, or complicit, in slavery or human trafficking.

We take pride in the conditions of employment for all our employees within TRC and Tindall Riley. We are committed to eliminating discrimination and encouraging diversity. TRC and Tindall Riley strive to create a work environment that is free from discrimination, harassment and victimisation; where all employees, job applicants, clients and suppliers are treated equally and fairly regardless of age, race, colour, nationality, national or ethnic origins, disability, sex, pregnancy, gender, sexual orientation, religion, belief, marital status or civil partnership status.

The employment and procurement practices operated by TRC and Tindall Riley mean that we are a supportive and ethical employer. We aim to provide a secure and open working environment where we provide a high level of professional service, which in turn helps to build and maintain our business and relationships over the long term.

Furthermore, TRC and Tindall Riley expect a high level of conduct from those companies with which we do business. It is our aim to ensure, as far as we can, that any third-party suppliers, correspondents or other third parties with whom we work operate in accordance with the same high standards that we embrace with regard to their own employees and supply chains.

ORGANISATIONAL STRUCTURE

TRC is a 100% privately owned company.

OUR SUPPLY CHAINS

Our supply chains are limited. We and the mutuals we manage offer insurance mediation solutions and are accountable to regulators in the UK (the Financial Conduct Authority), in Luxembourg (the Commissariat Aux Assurances), in Hong Kong (the Insurance Authority), in Singapore (the Monetary Authority of Singapore), in Japan, (the Financial Services Agency), in Denmark (the Danish Financial Supervisory Authority), in Greece (regulated by the Bank of Greece) and in New York (New York State Insurance Regulator).

We use routine services for the maintenance and support of our worldwide premises operations, e.g. support staff for office maintenance or communications infrastructure. We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

DUE DILIGENCE AND IMPLEMENTATION PROCESS FOR SLAVERY AND HUMAN TRAFFICKING

TRC and Tindall Riley operate a range of policies and procedures to identify and mitigate risks of modern slavery or human trafficking. These include:

- Outsourcing;
- Business Standards;
- Senior Managers;

- Financial Crime; and
- Whistleblowing.

No instances of modern slavery or people trafficking have been reported through our Whistleblowing process.

ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING MEASURES

TRC has an HR department led by our Group Director of People, a Risk and Compliance Department led by our Chief Risk Officer and an internal audit department led by our Head of Internal Audit. Each of these departments and individuals also have senior management responsibilities within Tindall Riley.

For a summary of firm-wide and departmental initiatives relevant to this Modern Slavery Statement, please see **Appendix A**:

TRAINING AND AWARENESS

This Statement is communicated to all our employees (at the date of publication and when any new employee joins us) in order to engender an understanding of the risks of modern slavery and human trafficking in our business and associated areas of our business.

All new employees benefit from eLearning on Modern Slavery; with all staff having received similar training in March 2021. The risk from Modern Slavery is also covered in face-to-face Compliance training of employees.

MODERN SLAVERY STATEMENT – FROM THE CHIEF EXECUTIVE OFFICER OF TRC

“The Company has a zero-tolerance position in respect of slavery and human trafficking and is committed to ensuring that this does not occur in its supply chain or business. The Company is also committed to acting ethically and with integrity in all its business relationships.”

Our Modern Slavery Statement reflects our commitment to act ethically and with integrity in all our business relationships.

LEGAL AND REGULATORY PURPOSE OF THIS STATEMENT

This Statement is made with specific regard to the obligations arising under section 54(1) of the UK’s Modern Slavery Act 2015. Accordingly, this Statement should be considered to constitute the Modern Slavery Statement for TRC for its financial year, 1 January 2024 to 31 December 2024 and until such time as it is modified or amended. Such modifications or amendments will be communicated to all new and existing employees.

Approved by the Board of Directors on 19 June 2024

Signed by Andrew Cutler, CEO of TRC



APPENDIX – A

TRC and Tindall Riley have undertaken the following steps relevant to this Modern Slavery Statement, some of which are well established items whilst a number are enhancements since last year:

Governance

Tindall Riley has recently established a Sustainability Working Group, in order to oversee and manage Environmental, Societal and Governance risks to which the Managers are exposed, this includes Anti-Slavery and Human trafficking measures.

Marketing

We require that suppliers of branded goods for TRC and Tindall Riley adheres to similar values in relation to their own business and supply chain.

Compliance

TRC's Compliance Team, as well as TRC's compliance procedures, have been further strengthened.

Daily checks are run against the WorldCompliance database to ascertain if any suppliers and businesses associated with TRC and Tindall Riley have been prosecuted or are known to have been charged with any offences in relation to Modern Slavery and Human Trafficking. No such instances have been detected as at the date of this Statement.

Human Resources (HR)

TRC's HR department sets out employee rights and responsibilities in contracts of employment, the Employee Handbook and related employment documentation. In addition, this department:

- conducts salary benchmarking activity to identify and address any pay discrepancies;
- ensures that TRC pays above minimum statutory wage requirements;
- reviews invoices received by agencies to ensure fair payment of contract staff;
- provides firm-wide Modern Slavery training; and
- provides an Employee Assistance Programme to promote physical and mental wellbeing for UK based employees.

Whistleblowing Hotline

Our whistleblowing hotline service has international coverage. Its contact details appear on the home page of TRC's intranet for ease of reference for all employees worldwide.