Britannia Group Statement on Slavery and Human Trafficking for Financial Year Ending 20 February 2023

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Structure

The Britannia Group is made up of The Britannia Steam Ship Insurance Association Holdings Limited and its subsidiaries, including The Britannia Steam Ship Insurance Association Europe ("Britannia Europe"), The Britannia Steam Ship Insurance Association Limited ("Britannia (UK)"), Universal Shipowners Marine Insurance Association Limited and the Britannia Group's Hydra Cell.

The Britannia Group outsources its day-to-day administration to Tindall Riley Europe s.à.r.l., Tindall Riley (Britannia) Limited, Tindall Riley & Co Limited ("TRC"), collectively Tindall Riley and such subsidiary companies and branches as are used in support of the Management Agreements with Britannia Europe and Britannia (UK) respectively ("the Managers").

Business activities

Britannia Europe and Britannia (UK) are mutual P&I Clubs providing P&I and FD&D cover to shipowners and charterers worldwide.

Britannia (UK) is domiciled in the United Kingdom while Britannia Europe is domiciled in Luxembourg, with significant operations in London, but also operating from offices in Copenhagen, Hong Kong, Kobe, New York, Piraeus, Singapore and Tokyo.

Our supply chains and risk assessment

The Britannia Group and the Managers use suppliers that fall in to two categories:

1. Routine services are used for the maintenance and support of worldwide operations, e.g. support staff for office maintenance or communications infrastructure; and,

2. Underwriting and claims services are supported by brokers, surveyors, lawyers, and correspondents, who act for The Britannia Group's insured but can be appointed by the Managers.

The Britannia Group does not function as a producer, manufacturer or retailer of physical goods and has no supply chain in relation to such activities.

Having a supply chain that provides skilled services and requires open communication and free movement to operate makes the resources involved less prone to exploitation and so low risk of slavery or human trafficking.

Where the Britannia Group supply chain involves a location or the provision of a product that increases the risk of slavery or human trafficking and additional due diligence is undertaken to counter the additional threat.

Our policies in relation to slavery and human trafficking

"The Britannia Group and the Managers have a zero-tolerance position in respect of slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business." – Andrew Cutler, CEO of TRC and the Britannia Group.

The Britannia Group and the Managers operate a range of policies and procedures to identify and mitigate risks, including in relation to modern slavery or human trafficking. These include policies and procedures in respect of:

Outsourcing	Standards of Business Conduct	Whistleblowing Policy and hotline
Senior Managers	Financial Crime	Employee handbook

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

Our systems & controls – due diligence, measuring effectiveness and training for staff

The Britannia Group conducts risk based due diligence on new suppliers, which includes:

- References being taken to ensure that suppliers are reputable.
- Screening suppliers before appointment and ongoing, against adverse media and enforcement action in relation to slavery or trafficking; and,
- Contractual clauses that describe the Group's slavery and human trafficking expectations.

All new employees are enrolled in eLearning on Modern Slavery when joining Tindall Riley; with all existing staff having received similar training in March 2021. The risk from Modern Slavery is also covered in face-to-face Compliance training of employees.

This statement was approved in respect of the financial year ending 20 February 2023 by the Britannia Group Boards of Directors on 4 July 2023.

A.J. Cutler
Chief Executive Officer
The Britannia Group
July 2023