

Modern Slavery Statement

The West of England Ship Owners Mutual Insurance Association (Luxembourg) (“West of England”) and its Managers, West of England Insurance Services (Luxembourg) S.A. (“the Managers”) are committed to the promotion of ethical business practices and to providing a working environment that is characterised by dignity and respect for all its staff. Similar high standards are required of all its commercial partners and this statement sets out the steps taken and the processes in place to ensure that the business and supply chain are free from modern slavery and human trafficking.

Business Framework

West of England is a leading mutual marine insurer providing its worldwide membership of ship owners, charterers and operators with liability insurance and related services. It is registered as a company in Luxembourg where the Head Office operation is based. The London office is its principal management office. There are also offices in Greece, Hong Kong and Singapore and correspondents in all the world’s major ports to assist its worldwide ship owner membership with any issues that might arise during the course of their membership.

Policies and Procedures

The Manager’s policies and procedures relating to recruitment, money-laundering, bribery and corruption, sanctions, conflicts of interest and whistleblowing are designed to ensure that its business and those of its suppliers are conducted ethically and in accordance with all applicable laws.

These policies and procedures will continue to be reviewed and amended as appropriate to ensure that they adequately address regulatory and legislative focus areas, including the requirements of the Modern Slavery Act 2015 as applicable to the business.

Employees

The Manager’s Employment Handbook illustrates its commitment to ethical and legal employment practices and its staff are fully informed as to the rights and protections afforded them by the law.

Staff are also provided with training on key compliance issues and advised of the code of conduct that they are expected to adhere to. Additionally, there is a Whistleblowing Policy which affords staff the opportunity to report any concerns they might have with the business’s compliance with applicable laws and ethical standards.

Supply Chain

As a supplier of insurance products and services, West of England has assessed the risk of its supply chains being involved in modern slavery or human trafficking to be minimal. Its key suppliers are firms providing professional services and these firms, as with all of its suppliers, are carefully checked and screened to ascertain whether there is any record of their involvement in unacceptable business practices which would prevent West of England from doing business with them.

The Managers will continue to review and monitor its suppliers and update and improve its policies and procedures to ensure that both its business and those of its suppliers are not implicated in modern slavery or human trafficking in any way.

Oversight and Review

Policies and procedures are reviewed regularly to ensure compliance with best practice and that they adequately reflect the legal and regulatory requirements resting on the business.

Compliance with the Modern Slavery Act 2015 will be monitored to ensure that the steps West of England has taken are adequate and effective and that additional measures are developed and implemented as necessary to maintain ongoing compliance with the Act's requirements.