



Modern Slavery Act 2015 Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and applies to Sirius International Insurance Corporation (SINT). The company operates in the UK through a licensed local branch office.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. SINT has a zero tolerance approach to any form of Modern Slavery. We are committed to acting ethically and with integrity and transparency in all business relations and putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within our business or supply chain.

About SINT

We are an insurance undertaking which obtained regulatory approval by the Swedish Financial Supervisory Authority, Finansinspektionen, on 2nd March 1995 and are a 100% owned subsidiary of Sirius International Insurance Group.

Our Supply Chains

As an insurance undertaking, SINT has a very limited supply chain. We partner with select service providers and third party suppliers as part of our business model, such as IT services, Audit services and Exposure Management. Our business consists of underwriting Insurance and Reinsurance and associated policy management and claims activities. We do not act as a producer or retailer of physical goods and have no supply chains relating to such activities. Enhancements we are making to our due diligence procedures and our outsourcing and supplier frameworks are specifically designed to ensure that our suppliers, agents and partners are both compliant with the Modern Slavery Act and more broadly committed to human rights and ethical corporate practices. We are in the process of updating relevant supplier contract terms to include a Modern Slavery Act clause.

Our Policies

Being part of the Sirius International Insurance Corporation Group ("the Group"), we recognise our obligations to all those with whom we have dealings – shareholders, employees, customers, clients, regulatory authorities, suppliers, competitors and the wider community. The Group demands and maintains the highest ethical standards in carrying out our business activities. Our reputation and the trust and confidence of those with

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whom we deal are of fundamental importance to the Group. Our values determine our behaviour and we must support and uphold them so that they are an integral part of day to day life. Our Code of Business Conduct aims to guide our actions and those of people with whom we work closely, encouraging a way of working which is honest, responsible and respectful, generating trust. We ensure that the standards in this code are communicated to and understood by our staff.

As a strictly regulated company, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include for example:

Code of Business Conduct

This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. The code enables all SINT employees to air genuine concerns they may have about suspected malpractice or wrongdoing within SINT (whistleblowing). Our aim is to develop a culture of openness and for our business to be conducted with the highest standards of integrity and honesty. Any form of malpractice or wrongdoing is taken very seriously. The code also includes our standards for management of conflicts of interest that may arise.

Remuneration Policy

This policy ensures that we pay employees a salary in line with the local market conditions and requirements set out by the financial supervisory authorities.

Treating Customers Fairly

For the UK branch office, this policy ensures that we pay due regard to the interests of our customers and treat them fairly.

Compliance policy

This policy sets a standard with no appetite for breach of regulations. It also outlines the responsibilities, processes and procedures related to compliance with regulations.

Fit and proper policy

This policy sets the basic principles for the standards and background controls for determining the fitness and propriety of persons who hold or are being considered for appointment to a Key person position.

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Privacy Policy

This policy defines standards, roles and responsibilities regarding the Processing of Personal Data carried out by SINT in order to protect the rights of Data Subjects (such as employees, customers and claimants).

Guideline on Alcohol and Drug prevention

This guideline aims at promoting that our employees conduct themselves in a professional and representative manner at all times and to provide our employees with a safe and secure working environment.

Training

SINT will communicate this statement to our UK employees and include it as part of the induction materials to all new members of UK staff, in order to promote awareness of Modern Slavery.

Subsidiary Companies

This statement is applicable to the following subsidiary companies located within the United Kingdom

- Sirius International Managing Agency Limited
- Sirius International Corporate Member Limited
- Syndicate 1945

Approval

This statement was approved by the SINT Board at their meeting held 25th of June 2020 and constitutes the statement for the financial year ended 31 December 2019.

Monica Cramér Manhem
Managing Director

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