

## **AIG Europe Limited - Modern Slavery and Human Trafficking statement**

We are committed to ensuring that no practices of modern slavery or human trafficking take place within AIG Europe Limited and its subsidiaries, whether directly or within our supply chain, and ensuring that we continue to review our practices for consistency with best practice.

### **ORGANISATION STRUCTURE**

AIG Europe Limited is a provider of general insurance products and services across the Europe region. We operate out of the UK and a total of 25 branches across the European Economic Area and Switzerland. We are a part of the wider AIG group ("Group"), and our ultimate parent company is American International Group, Inc. with its head office in New York, the United States of America.

### **OUR BUSINESS AND SUPPLY CHAINS**

Our business serves commercial, institutional, and individual customers. Our products range from travel assistance, accident and health policies for consumers through to financial lines, trade credit, aviation, marine and property and casualty insurance protection for businesses. We also provide various multinational products.

Our supply chains include third party suppliers of IT services; telecoms; facilities management services including, for example, cleaning, security and stationary; marketing materials; and professional services, such as claims handling, accountancy, legal and HR services.

### **OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have introduced requirements to monitor this within our auditing process of third party suppliers. We strive to act in an ethical manner with respect to all of our suppliers and business partners and to endorse the same high standards in their dealings with us.

### **COMBATING SLAVERY AND HUMAN TRAFFICKING AND IDENTIFYING ANY RISKS**

We continue to conduct internal assessments to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains. We have completed a review with our Human Resources and Procurement teams, the results of which have not identified evidence of existing slavery or human trafficking in our supply chains. In terms of the level of risk, because of the nature of our business and our suppliers, our assessment shows a lower risk profile than in many other industries. We intend to continue focusing on our supply chains going forward through our periodical internal audits of such suppliers. Any risks identified from these audits will also be recorded and escalated if needs be. We intend to maintain records of, and monitor, any risks identified. We have also introduced modern slavery and human trafficking queries as part of our internal audits of suppliers.

We have updated many of our standard UK supply agreements with third party suppliers to incorporate provisions around compliance with the Modern Slavery Act 2015 (the "Act"); and we obtain confirmation as part of our on-boarding process with new suppliers that they, their affiliates and their subcontractors comply with the Act; and do not engage in modern slavery practices.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we carry out ongoing monitoring of the third party suppliers we use.

We have in place systems to:

- (a) identify and assess potential risk areas in our supply chains.
- (b) mitigate the risk of slavery and human trafficking occurring in our supply chains.
- (c) monitor potential risk areas in our supply chains.
- (d) protect whistle blowers.

## **SUPPLIER ADHERENCE TO OUR VALUES**

We have in place various internal vendor and supplier policies which are designed to ensure all those in our supply chain and all contractors we engage comply with our values and to minimise the risk of slavery and human trafficking.

We also have dedicated internal vendor management teams that are aware of our responsibilities under the Act and whose roles include ensuring that the systems and controls described above function appropriately.

## **SPECIFIC STEPS TAKEN IN LAST PERIOD**

We have:

- shared this statement with all of our staff members and included it within our joining materials for our new employees;
- continued to further examining our supply chains to identify any risk areas;
- updated our precedent agreements with third parties; and
- updated our internal whistle-blower policy, to incorporate specific provisions linking to the Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 30 November 2017.



Director of AIG Europe Limited

Date: 22 November 2018