

North Group
Statement on Slavery and Human Trafficking for
Financial Year Ending 20 February 2019

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to all undertakings in the North Group of companies (“Group”).

Group structure

The North Group is a global marine insurance group consisting of the North of England Protecting and Indemnity Association Limited (“North”) and its subsidiary companies, including Sunderland Marine Insurance Company Limited (“Sunderland Marine”) and North of England P&I DAC (“North EU”). North is the ultimate parent company of the Group and has its head office in the United Kingdom.

Our principal business activities

North and North EU are mutual marine insurance companies providing insurance cover to their members in respect of P&I, FD&D and War risks, and fixed premium marine insurance to the fishing and aquaculture industries.

Sunderland Marine provides fixed premium marine insurance to the fishing and aquaculture industries.

Our supply chains and risk assessment

We believe that there is a low risk of slavery and human trafficking occurring in our supply chains. Our key suppliers are those that support our insurance underwriting and claims handling activities, in particular reinsurers, suppliers of IT equipment and services and professional service firms such as brokers, loss adjusters, correspondents, surveyors, lawyers, accountants and actuaries.

Our values and policies in relation to slavery and human trafficking

We have a zero tolerance policy to 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. Our core values of teamwork, integrity and commitment emphasise the importance of acting ethically and lawfully in all our business relationships and implementing and enforcing effective systems and controls to ensure that activity such as slavery and human trafficking is not taking place anywhere in our supply chains.

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

Due to the low risk nature of our supply chains we do not consider it necessary or proportionate to adopt a formal due diligence programme, supply chain compliance programme, staff training programme or performance indicators specific to risks of slavery and human trafficking. We do however have in place general systems and controls to:

- Identify and assess potential risk areas in our business.
- Mitigate risks to our business.
- Monitor potential risk areas in our business.
- Undertake due diligence in relation to material contracts and outsourcing arrangements.
- Establish and maintain conduct standards ensuring we conduct our business responsibly, ethically and in accordance with applicable laws and regulations.
- Protect whistle blowers.
- Promote corporate social responsibility recognising our wider social and environmental responsibilities.

We are satisfied that these systems and controls are reasonable and proportionate to the risks of slavery and human trafficking that exist within our supply chains and effective in ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This statement was approved by the North Board of Directors on 23 May 2019 in respect of the financial year ending 20 February 2019.

P.A. Jennings

Chief Executive Officer/Executive Director

The North of England Protecting and Indemnity Association Ltd

North of England P&I DAC

Sunderland Marine Insurance Company Ltd

23 May 2019