

AmTrust International

Modern Slavery Act 2015 Section 54 –
Slavery and Human Trafficking Statement



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Introduction

This Modern Slavery Act 2015 Section 54 – Slavery and Human Trafficking Statement – 2021 (the “Statement”) is published in accordance with the requirements of the transparency in supply chains provision of the Modern Slavery Act 2015 (the “Act” or “MSA”) for the financial year ending 31 December 2021.

The AmTrust Group is a multinational specialty property and casualty insurance group. AmTrust underwrites from various insurance platforms in Europe and has within the group claims administrators, underwriting agencies, insurance intermediaries and employment service companies including:

- AmTrust Europe Limited, a UK regulated insurance company with its head office in London
- AmTrust International Underwriters Designated Activity Company, our Irish regulated insurance company based in Dublin
- AmTrust Assicurazioni S.p.A, our Italian regulated insurance company based in Milan
- AmTrust Nordic AB, based in Stockholm and providing underwriting, risk and claims management throughout Scandinavia for AmTrust International Underwriters Designated Activity Company
- Motors Insurance Company Limited, a UK regulated insurance company based in Leeds
- Car Care Plan Limited an administrator of motor warranty and related insurance based in Leeds

The AmTrust Group entities in scope of the Act as at 31 December 2021, whether by meeting the criteria or being part of the supply chain, are set out in the Annex, collectively “AmTrust” in this statement.

The services AmTrust provides are generally regulated activities and subject to the supervision of the relevant competent authorities in the jurisdictions in which Amtrust operates.

Approach to Slavery and Human Trafficking

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains which include but are not limited to insurance and reinsurance arrangements and suppliers.

We are also committed to ensuring that there is transparency in our approach to tackling modern slavery consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners.

We understand that modern slavery risk is not static and we will continue to take actions to mitigate this risk in the year ahead. We will ensure that we build upon the work already completed and engage with our suppliers to determine where further action is needed.

We look to hold all of our employees and suppliers or associated parties accountable to AmTrust’s modern slavery standards.

We strive to maintain the highest standards of employee conduct and ethical behaviour including as it relates to operating and managing our supply chain. AmTrust’s policies, procedures and training cover relevant conduct requirements and where applicable emphasise that breaches of human rights will not be tolerated. In particular, our global Code of Business Conduct & Ethics, accessible via the AmTrust Intranet, makes clear to employees the actions and behaviour expected of them and includes specific reference to preventing modern slavery. Employees are required to review the Code of Business Conduct on an annual basis and confirm that they have read and understood it and will report any applicable violations.

To further reinforce awareness and accountability, staff are required to complete an online mandatory training module dedicated to Human Trafficking. This training incorporates reference to this Statement and employees are required to attest as to their understanding and compliance with the principles contained within it. This module forms part of our annual mandatory training schedule. Non-completions are monitored and escalated accordingly.

Any concerns with regard to modern slavery can be reported via multiple channels as noted within this Statement including via our Anonymous Global Confidential Ethics Hot Line, hosted via a third party, and accessible via the AmTrust Intranet homepage to make it easy for staff to make disclosures without fear of retaliation.

Due Diligence Processes

AmTrust continues to enhance its supplier on-boarding processes in conjunction with the Global Procurement and Third Party Risk Management (“TPRM”) policies to ensure that these remain reflective of current procedures, continue to incorporate best practices and meet the requirements of prevailing legislation and regulations.

AmTrust has a comprehensive supplier on-boarding and risk assessment process. Procurement works closely with supply chain relationship managers to complete the required due diligence to ensure that we manage and mitigate any associated risks, including our obligations under the Act.

In 2021 AmTrust employed a dedicated Third Party Due Diligence Program Director to oversee our third party risk management framework and to conduct an end-to-end review of our associated processes to identify opportunities for enhancements. The majority of AmTrust’s suppliers are deemed low risk (due to their location and the types of services provided to AmTrust) however, we ask all suppliers to sign an MSA affirmation and, based on our risk assessment methodology, we ask that suppliers sign a contractual commitment to the obligations under the Act or have published statements detailing their commitment to the Act.

As it relates to AmTrust employees, we conduct “right to work” checks and background screening for our employees in line with the remit fulfilled, business and country in which the employee is based and the applicable regulations. We continue to review and identify further opportunities to enhance our screening (both on hire and during the course of employment) across our different locations.

Reporting mechanisms

Employees, business partners and suppliers with concerns regarding modern slavery can report them through the following channels:

- a) Human Resources Department
- b) Compliance Department
- c) Confidential Ethics Hot Line (www.amtrushotline.ethicspoint.com / UK tel: 0808 234 6655) – full details, including a list of international numbers, are available via the AmTrust intranet with the site hosted by EthicsPoint in order to protect anonymity
- d) <https://www.gov.uk/guidance/report-modern-slavery-as-a-first-responder> (or other relevant country government reporting mechanisms as applicable)

Continued areas of focus and improvement

We are committed to maintaining and improving our systems and processes to prevent slavery and human trafficking. On an ongoing basis we will continue to:

- Review and identify opportunities to enhance supplier due diligence and risk assessment methodologies

- Review and identify opportunities to further highlight our zero-tolerance approach to modern slavery within our supply chains or in any part of our business throughout our policies and processes
- Update and relaunch the online mandatory training module on Human Trafficking on an annual basis
- Make use of the Intranet platform and regular newsletters to reinforce our approach to modern slavery and identify opportunities to continue to raise awareness with employees
- Focus on the development and monitoring of key performance indicators in relation to hiring, training, reporting and supplier management and taking appropriate actions as needed

This Statement was approved by the Managing Board of AmTrust International Limited on 28 June 2022

A handwritten signature in black ink, appearing to read 'Peter Dewey', with a horizontal line underneath the name.

Peter Dewey
Chief Executive Officer, AmTrust International Limited

Date: 28 June 2022

Annex

AmTrust Group (effective 31 Dec 2020)

AmTrust Entity	Company	Website (if applicable)
AmTrust International Limited	European Holding company	www.amtrustinternational.com
AmTrust Europe Limited	Insurer	
AmTrust Europe Legal Limited	Insurance intermediary (deauthorised and dissolved on 5 January 2021)	
AmTrust International Underwriters DAC	Insurer	
AmTrust Assicurazioni S.p.A	Insurer	https://www.amtrust.it
AmTrust Insurance Agency Italy SRL	Insurance intermediary	https://www.amtrust.it/area-agenzia.html
AmTrust Syndicates Limited	Managing agent	
AmTrust Underwriting Limited	Insurance intermediary	www.amtrustunderwriting.com
ANV Global Services Limited and ANV Global Services Limited Sucursal en España	Managing agent	http://anv.eu.com
AmTrust Central Bureau of Services Limited and ANV Central Bureau of Services Limited Sucursal en España	Service company	http://anv.eu.com
Car Care Plan Limited	Administrator	www.carcareplan.com
Motors Insurance Company Limited	Insurer	
Car Care Plan Europe Sociedad Limitada	Administrator	
Car Care North America, Inc.	Administrator	
Caravan Security Storage Limited	Administrator	https://cassoa.co.uk/
AMT Mortgage Insurance Limited	Insurer (deauthorised and dissolved on 1 March 2022)	https://amtrustinternational.com/ http://amtmortgageinsurance.co.uk
AMT Specialty Europe SL	Insurance intermediary	
AMT Specialty Spain SL	Underwriting Agency	
AMT Intermediaries Limited	Holding company	
AmTrust Management Services Limited	Management services	https://amtrustfinancial.com/
AmTrust Management Services Ireland Limited	Management services	
Arc Legal Assistance Limited	Insurance intermediary	https://www.arclegal.co.uk
Collegiate Management Services Limited	Insurance intermediary	www.collegiate.co.uk
AmTrust France SAS	Claims management company	
AmTrust Nordic AB	Claims administrator and general agent	amtrustnordic.se
AmTrust Insurance Services Norway AS	Claims administrator and insurance intermediary	http://www.aisn.no
AmTrust Insurance Services Sweden AB	Insurance intermediary	http://aissforsakring.se
Dent Wizard Ventures Limited	Repairer	https://dww.co.uk
Legal Insurance Management Limited	Insurance intermediary	https://www.legalim.co.uk
WeDo Group Limited	Repairer	https://www.wedogroupltd.com
Runnymede Law Limited	Law Firm	https://www.runnymedelaw.co.uk
Qualis Europe Srl	Insurance intermediary	https://qualiscreditrisk.com

Qualis U.K. Limited	Insurance intermediary	
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