



## **Modern Slavery and Human Trafficking Policy Statement**

### **Our Approach**

Within the European Convention on Human Rights, Article 4 states that; 'no one shall be held in slavery or servitude and no one shall be required to perform forced or compulsory labour'.

The Modern Slavery Act 2015 (the Act), a UK legislation, creates offences relating to holding another person in slavery or servitude, by requiring another person to perform forced or compulsory labour and human trafficking. In this respect, human trafficking is where a person arranges or facilitates the travel of another person with a view to the transported person being exploited, i.e. through slavery, servitude, forced or compulsory labour.

Due to Atlas Insurance PCC Ltd (Atlas) having presence in the UK through its branch, it is subject to this Act. Atlas seeks to ensure that these principles are pursued across its business and that its suppliers also commit to the same ethical standards. Atlas is committed to conducting business ethically and responsibly. Atlas also seeks to ensure that its suppliers and their supply chains operate to those same high standards, including those in relation to employment practices, workplace conditions and, more specifically, the prevention of forced and trafficked labour. This is upheld through the company's policies and processes and is supported by the Directors and Leadership Team.

Atlas does not condone or tolerate the use of slavery, slave labour or servitude in the manufacture of products it markets and will not accept products or services from suppliers that utilise or condone any such illegal practices, wherever in the world they occur. This policy sets out how Atlas will make efforts to eradicate human trafficking and slavery from both our own business and also from its supply chains.

Atlas and its suppliers are required to confirm that they comply with the Act by agreeing to be bound by Atlas Modern Slavery & Human Trafficking Policy. This requires their commitment to take necessary steps to ensure that any materials incorporated into the products they provide have been sourced from suppliers who also comply with the laws regarding human trafficking and slavery in the country or countries in which they operate.

### **Aims and Objectives of the Policy**

Atlas takes its responsibilities seriously and is committed to promoting ethical and lawful employment practices, including the provision of a work environment that is free from slavery, servitude, forced or compulsory labour and human trafficking. It also requires its suppliers, sub-contractors and business partners to follow these practices worldwide.

### **Overview**

Atlas and its suppliers, contractors, sub-contractors and agents shall:

- Not use forced or compulsory labour (i.e. work or service that a worker provides involuntarily, or under threat of penalty, including forced overtime where such has not been approved by collective bargaining).



- Ensure that the terms of employment are voluntary and freely entered into by the worker, and that personal documents such as passports are not withheld.
- Ensure that workers are not charged a fee in association with their recruitment and that they are not required to lodge security payments or deposits.
- Comply as a minimum with age requirements prescribed by applicable laws in the country in which they operate.
- Remunerate its workers with wages and benefits that meet or exceed the legally required minimum in the country in which they operate.
- Abide by any applicable law concerning maximum hours of work prevailing in the country in which they operate.

### **Business Structure and Supply Chains**

Atlas is an insurance Company based in Malta with a branch operating in the UK with a simple structure of the branch reporting into the parent Company. We source the vast majority of our clients through regulated intermediaries offering policies which fall in the following classes of business:

Accident, damage to property, fire and natural forces, general liability, land vehicles, miscellaneous financial loss, motor vehicle liability and sickness.

### **Organisational Policies**

Atlas has organisational policies in place, honed over years of experience and managed by our personnel department. We are a reputable employer with a heritage of over 100 years of positive employment practice behind us. We exceed all current employment legislation requirements and abide by all applicable law with regard to Modern Slavery and Human Trafficking laws.

### **Due Diligence**

Atlas carries out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.

We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

### **Responsibility for Implementing this Policy**

The Chief Risk and Compliance Officer (CRCO) is responsible for creating, implementing and managing the Policy and relative Statement to support the promotion of ethical and lawful employment practices internally and throughout the Atlas supply chain.

Our activities to promote lawful employment practices will be reviewed regularly and changes and updates to the policy may be made in order to apply the latest best practice approaches and as a minimum, there will be an annual statement update on before each anniversary of the last statement, as prescribed by the Government guidelines.

### **If you are one of our Suppliers**

If you supply us with goods or services, you must assess your business and supply chains and confirm to us that you:

- Comply with your legal obligations, in relation to Modern Slavery; and
- Are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.



If you breach this policy, or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

**If you are an Employee or a Worker providing services for us**

You must immediately report any suspicions of Modern Slavery in our business or supply chains to our CRCO. Our CRCO will investigate and report to our Board of Directors within a reasonable time, on actions which may require to be taken.

You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our CRCO and, if you are an employee, refer to our Raising Concerns (Whistleblowing) Policy.

Atlas will register this statement on the Government's Modern Slavery Registry each year.

Dated 30<sup>th</sup> June 2025

A handwritten signature in dark ink, appearing to be "Catherine Calleja", written over a horizontal line.

Director Responsible for this Statement: Catherine Calleja  
Position in Company: Executive Director & Group Company Secretary  
Next Formal Statement Update: 30<sup>th</sup> June 2026  
Issue No. 1

