

Admiral Group Modern Slavery Statement 2017

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Admiral Group Plc and other relevant group companies¹ ('Admiral' or 'Group') during year ending 31 December 2017 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

Admiral Group published its first Modern Slavery Statement in June 2017 and in the last 12 months has continued to develop its response to this risk.

Our approach

As reported in our first Modern Slavery Statement in June 2017, we support the aims of the Act and seek to ensure slavery and human trafficking does not feature in our business or supply chain. We run our business in a responsible manner and our employment practices provide a foundation for operations which are viewed as excellent and supportive employers. To the extent that the Group operates as a purchaser of goods or services we expect a high level of ethical conduct from those businesses with which we do business. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Employees are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

Our organisation and business

Admiral Group Plc is the holding company for a group of companies providing insurance and ancillary products and services. Admiral is incorporated in the UK and is listed on the UK Stock Exchange. The companies within the Group are either regulated insurance or service companies or serve a purpose ancillary to the Group's principal activities in insurance. Admiral operates from its Head Office in Cardiff in the UK and has over 9,000 employees worldwide. Admiral operates principally in the UK but is licensed to underwrite insurance business in Europe and the United States of America. Further details of Admiral's structure can be found on our website (<https://admiralgroup.co.uk>)

Our supply chain

Our supply chain is varied and includes direct (claims settlement) and indirect suppliers. We provide insurance and ancillary products and services in the UK and internationally and, in addition, use services in India and Canada to support these operations. We do not act as a manufacturer or retailer of physical goods.

Policies and contractual controls

Admiral's internal policies include our General Standards of Conduct and our Anti-Fraud and Suspicious Events Policy, Anti-Bribery Policy, Equality, Diversity and Dignity at Work Policies where we confirm we expect staff to act with honesty and integrity and comply with all relevant legislation and requirements. During 2017 Admiral introduced an Anti-Slavery Policy to advise all employees of our commitment to eliminating unethical working practices. It also provides guidance on who to contact should they spot a problem not just at work, but in their local community. We also operate a Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chain which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports are fully investigated and appropriate remedial actions taken.

1. This statement sets out the steps taken by Admiral Group plc, Admiral Insurance Company Limited, EUI Limited and Inspop.com Limited, all of which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015. Admiral subsidiaries that are not required to comply with the requirements are required to follow Group guidance.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to minimise the risk of Modern Slavery taking place in our business or related supply chain.

Risk assessment, due diligence, suppliers and supply chain

We have developed a risk assessment process to assess the likelihood of modern slavery occurring in our supply chain which takes into account a number of factors including geographic location, nature of goods and services being supplied, supply chain length and the use of temporary or migrant labour. The risk assessment process allows us to identify potential areas of concern within our supply chain and is performed annually. The annual review has not resulted in any significant change in our risk assessment.

During 2017 our updated UK Procurement Policy was approved. This sets out supplier due diligence requirements and requires suppliers to comply with the Procurement Policy including:

- providing employees with good working conditions, fair treatment and reasonable rates of pay; and
- respecting workers' human rights and complying fully with all applicable laws.

During 2017 we have also developed a Group Procurement and Outsourcing policy which will be implemented during 2018.

Modern Slavery training

We will continue to communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business. In addition, during 2017 the Group introduced Modern Slavery awareness training as part of our compulsory induction and ongoing compliance training for all employees.

In addition, and recognising the extremely complex nature of Modern Slavery, we continue to emphasise the importance of collaboration with others and have participated in government consultations on the Modern Slavery Act.

Assessment of effectiveness in preventing Modern Slavery

We understand that Modern Slavery risk is not static, and will continue our approach to mitigating this risk in the year ahead.

Key performance indicators:

In order to assess the effectiveness of the measures taken by Admiral we have reviewed the following key performance indicators:

- staff training levels - following the implementation of the Modern Slavery training, almost 1,000 staff members have completed this training; and
- investigations undertaken into reports of Modern Slavery and remedial actions taken in response – no reports of Modern Slavery reported.

This statement was approved by the Boards of Admiral Group plc, Admiral Insurance Company Limited, EUI Limited and Inspop.com Limited.



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Signed by David Stevens, Admiral Group CEO