



HAMPDEN

Modern Slavery Act 2015 Statement

This statement is made on behalf of the Hampden Group of companies ('Hampden Group or 'the business'). We are publishing this statement in accordance with the Modern Slavery Act 2015 and as a demonstration of our commitment to anti-slavery practices and as an affirmation of the values we hold across our business.

Hampden Group is committed to ensuring that it always complies with its statutory obligation, operates in an ethical manner and upholds the principles of good corporate citizenship.

A significant part of this commitment is that the Hampden Group has zero tolerance to slavery and human trafficking and is committed to these not being a feature of its supply chains.

About us

Hampden Group is a provider of (re)insurance, investment and financial support services to its clients, which are types of financial services products and services. We do not act as a producer, manufacturer or retailer of physical goods and we have no supply chain in relation to such activities.

The Hampden Group, for the purposes of this policy, includes:

- Hampden Holdings Limited
- Hampden Agencies Limited
- HampdenFX Limited
- ArchOver Limited
- Nomina PLC
- Hampden Insurance Partners (Cayman) Limited
- Seymour Taylor Limited and ST Hampden Limited trading as "Seymour Taylor"
- Hampden Private Office Limited
- Hampden Tax Consultants Limited
- Verto Syndicate 2689

Hampden Group policies and procedures;

Hampden Group is committed to ensuring that those in the supply chain do not engage in slavery or human trafficking and regularly reviews its policies and procedures to ensure that they are up to date and reflect the changing regulatory environment. We communicate this statement to all our staff to ensure that they understand the risks of modern slavery and human trafficking in our supply chains and to demonstrate our zero-tolerance approach.

In addition to a periodic review of material outsourced arrangements, there are whistle blowing procedures in place to ensure that employees can raise any concerns that they have including any concerns in relation to modern slavery and human trafficking, with business operating under a code of practice and standards of business conduct.

Due diligence



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Hampden Group procurement processes, ensure that consideration is given to the appropriateness of the supplier against a number of criteria, both quantitative and qualitative. Consideration is given as to whether the provider has adequate risk management processes and procedure, conduct risk controls, measure to combat financial crime (including bribery, money laundering and trade sanctions) and measures to combat slavery and human trafficking where appropriate. Suppliers are expected to adhere to all local laws and regulations.

Supply Chains

As a provider of (re)insurance products and services we have limited supply chains to distribute and service this business and so we consider the risk of modern slavery or human trafficking to be relatively low. The business operates in diverse geographic locations including the United Kingdom, Europe, Channel Islands and Cayman Islands. Suppliers provide a wide range of predominantly professional products and services to support the Hampden Group's business and we believe that this limited supply chain means that risk modern slavery and human trafficking within it to be relatively low.

Hampden Group expects its suppliers to uphold the same high standards of corporate responsibility as are applied across the Hampden Group.

This statement is approved by the Board of Hampden Capital Plc and is reviewed on an annual basis.