



Haven Insurance Company Limited – Modern Slavery Act 2015 Annual Transparency Statement

For year ending: 31st December 2024

1. Introduction

This statement has been published in accordance with the United Kingdom’s Modern Slavery Act 2015 (the “MSA”). It sets out the steps taken by Haven Insurance Company Limited (“Haven”) during year ending 31st December 2024 to prevent modern slavery and human trafficking in its business and supply chains.

Whilst the MSA is not directly applicable to Haven as an insurer registered and regulated in Gibraltar, Haven complies with MSA requirements as it undertakes business activities in the United Kingdom (“UK”). Haven is committed to ensuring that no form of modern slavery takes place within its own operations or supply chains.

Modern slavery is defined under the MSA as slavery, servitude, forced or compulsory labour and human trafficking. Haven has a zero-tolerance approach to modern slavery and human rights violations and is therefore committed to an ethical and sustainable supply chain. Haven supports the MSA and aims to remove all forms of modern-day slavery and human trafficking from its business practices.

Haven is also committed to ensuring transparency within its business and to mitigating any potential risk of modern slavery throughout its supply chains, consistent with the disclosure obligations of the MSA. Haven expects the same high standards regarding the prevention of modern slavery from all its contractors, suppliers, and business partners.

2. About Us

Haven provides motor and household insurance to the UK market and is authorised and regulated by the Gibraltar Financial Services Commission (the “GFSC”).

3. Supply Chain

Haven recognises its responsibility to ensure suppliers have fair and ethical labour practices. Our supply chain includes insurance brokers, comparison websites, vehicle replacement providers, repairers, counter fraud and intelligence providers, payment providers, cloud providers, software providers, and solicitors. Haven undertakes a review of, and monitors, the use of new and existing suppliers. To date, Haven has no knowledge or incidents of modern slavery, human trafficking or child labour having occurred within its supply chain. We will continue to work with suppliers to understand how they manage modern slavery risks.

4. Recruitment Practices

Haven is committed to fair recruitment and employment conditions. Haven recognises the right of each employee to freedom of association, including the right to join trade unions. Haven ensures that it complies with employment legislation and does not employ people who do not have the right to work in Gibraltar.

5. Governance

Haven has a wide range of comprehensive policies in place. Including a Code of Conduct, Anti-Bribery and Corruption, Anti-Money Laundering and Fitness and Propriety. All policies reaffirm Haven's expectation for staff members to act with honesty and integrity whilst complying with applicable legal and regulatory requirements.

Haven has a dedicated policy on anti-slavery which reflects the company's commitment to -

- Act with integrity and ethically in all business relationships;
- Ensure the Board, senior management and all other staff members are aware of the principles and requirements of the MSA;
- Enforce effective due diligence processes and controls to ensure slavery and human trafficking is not taking place anywhere within the business or its supply chains;
- Carry out risk assessments to understand the company's exposure to the risk of modern slavery;
- Maintain fair recruitment procedures and conditions of employment; and,
- Encourage the reporting of any actions which may contravene the MSA.

6. Supplier Due Diligence

Haven is committed to a transparent and robust procurement process. Haven has a vendor integrity screening programme which ensures oversight and prevention of corruption, bribery and other forms of non-compliance including modern slavery, human trafficking, or child labour.

Haven's Outsourcing policy governs the proposal process, due diligence, contractual requirements, risk mitigation, and management of its supply chains. Further, specific work is carried out to ensure ongoing mitigation of the risk of slavery, including -

- Incorporation of the risk of modern slavery into the supply chain risk assessment, ensuring it is appropriately identified, assessed, and mitigated; and,
- Consideration of the risk of slavery in Haven's operational framework, including the risk within the company's risk register.

Haven continuously reviews its approach for the prevention of modern slavery and will continue to undertake due diligence on its operational framework and supply chains throughout 2025.

When sourcing contracts, we require prospective suppliers to confirm whether they are a relevant organisation under section 54 of MSA 2015, and if so whether they are compliant with the annual reporting requirements in section 54.

Over the next 12 months, we will continue to review our modern slavery due diligence activities to assess compliance with legislation on all procurements and assess and manage suppliers in high risk categories/geographies.

7. Risk Assessment and Quality Assurance

Due to the nature of Haven’s business, we consider the inherent risk of modern slavery and human trafficking occurring in the business to be low. Nonetheless, we take the responsibility to identify and effectively respond to any incidents of modern slavery and human trafficking very seriously.

Haven has a risk management system in place which identifies, assesses, measures, monitors, and manages risks that the company is or may potentially be exposed to. These risks are documented in Haven’s Risk Register, Risk Profile, and Risk Appetite statements. Haven’s risk management system considers modern slavery and covers both operational framework and supply chains.

Haven also maintains a system of quality assurance and auditing activities which covers the implementation of internal controls to ensure adequate oversight and management of risks that the company is exposed to. During 2024 we made further enhancements to our current risk assessment, including analysing risks identified and the outcome of supplier due diligence.

8. Staff Awareness and Training

Haven has an Anti-Slavery policy in place, which applies to all staff members. The policy reinforces Haven’s zero-tolerance approach to modern slavery and commitment to act ethically and with integrity in all business dealings and relationships. Further, Haven’s Code of Conduct policy sets out the minimum standards of behaviour expected from all staff members, to ensure ongoing trust and integrity.

Haven recognises that educating staff is fundamental to ensuring that risks of modern slavery are identified, reported and managed in a timely and effective manner. All staff members at Haven complete an online training course on modern slavery, on an annual basis, which includes awareness of indicators of modern slavery and reporting procedures where there may be a concern or suspicion of modern slavery.

9. Continuous Improvement

Haven continuously reviews how it can improve and further mitigate the risk of modern slavery in all of its business operations and supply chains.

10. Board Approval

The Directors of Haven Insurance Company Limited approved this statement on the 24/03/2025.

Christopher Lathey

Managing Director