

Modern Slavery Act 2015 Statement

The Modern Slavery Act (MSA) 2015 is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery and consolidates previous offences relating to trafficking and slavery.

At Antares (see Antares company list below), we always work to the highest professional standards and comply with all laws and regulations applicable to our business. We expect the same high standards from those parties we engage with, and we are committed to ensuring that there is no modern slavery or human trafficking in our operations, supply chain or other business dealings (e.g. through investments).

Structure and supply chains

Antares specialises in providing insurance and reinsurance products and services globally through Lloyd's of London and a trusted network of intermediaries. Our products include property, marine, energy, motor, casualty and specialty lines including cyber covering commercial and professional risks as well as consumers.

Antares is the collective name for our group of companies on whose behalf this statement is issued, including the companies listed below::

- Antares Global Management Limited (“**AGML**”) provides services to other Antares companies and is registered in England and Wales, with its registered office located at 21 Lime Street, London, EC3M 7HB. AGML also administers the Württembergische Versicherung AG (“**WVAG**”) UK Branch portfolio. WVAG is a German registered company.
- Antares Managing Agency Limited (“**AMAL**”) is registered in England & Wales, with its registered office located at 21 Lime Street, London EC3M 7HB. **AMAL** is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.
- Antares Insurance Company Limited (“**AICL**”) is registered in England & Wales, with its registered office located at 21 Lime Street, London EC3M 7HB. AICL is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.
- Antares Underwriting Limited (“**AUL**”) is registered in England & Wales, with its registered office located at 21 Lime Street, London EC3M 7HB. AUL is a corporate member at Lloyd's of London.
- Antares Reinsurance Company Limited (“**Antares Re**”) is registered in Bermuda, with its registered office located at 71 Pitts Bay Road Pembroke HM08 Bermuda, and is authorised and regulated by the Bermuda Monetary Authority. Antares Re is authorised by the Prudential Regulation Authority, and is subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority.
- QIC Europe Limited (“**QEL**”) is registered in Malta under number C67694. QEL is authorised by the Malta Financial Services Authority, and is subject to limited regulation by the Financial Conduct Authority and Prudential Regulation Authority.
- West Bay Plc, Markerstudy Insurance Company Limited, and St Julians Insurance Company Limited are subsidiary companies of Antares Reinsurance Company Limited, are registered insurers in Gibraltar and are regulated by the Gibraltar Financial Services Commission (West Bay Insurance Plc company number 84085; Markerstudy Insurance Company Limited company number 78789; and St Julians Insurance Company Limited company number 116718). These companies are administered by Markerstudy Insurance Services Limited, a UK registered insurance distributor, which is external to Antares.

Our supply chain includes our distribution partners and specialist insurance service companies as well as commercial suppliers for business operations. Examples include Lloyd's, wholesale and retail

brokers, delegated underwriting agents and claims agents, Commercial suppliers that support our business operations include office and facilities management, IT and business equipment, marketing, and professional legal and auditing services. Our suppliers are partners in our business success and they are expected to comply with all applicable laws and regulations. We apply a rigorous due diligence process to our suppliers and business partners, and continue to regularly evaluate our suppliers' performance and pricing benchmarks to ensure effective planning to mitigate risks regarding supply chain disruptions.

Policies in relation to slavery and human trafficking

Antares has adopted a series of policies to reinforce its dedication to adhere to anti-slavery and anti-trafficking standards, including:

- Antares Global Code of Conduct: our Code of Conduct outlines Antares employees' responsibilities to identify, prevent, and report any unethical occurrences of human rights violations or modern slavery within our organisation and supply chain.
- Antares Global Outsourcing Policy: our outsourcing policy governs our engagement with third-party service providers and suppliers, outlining our criteria for assessing and managing outsourcing risks. The policy ensures that our outsourced activities are conducted in accordance with regulatory and legal requirements, including Modern Slavery legislation.
- Antares Global Whistleblowing Policy: our whistleblowing policy empowers our employees and contractors to report concerns about wrongdoing, including unethical and illegal behaviour, without fear of retaliation. It provides procedures for confidential reporting and ensures that all reports are thoroughly investigated by us.

Due diligence processes in relation to slavery and human trafficking and risk assessment and management

We have embedded a risk management framework throughout our operations to ensure we effectively analyse and manage the risks to our business. This includes analysing the risk of inadvertently working with suppliers, or dealing with businesses who do not share our commitment to anti-slavery and human trafficking.

We regularly review our supply chain to ensure that we identify and assess key risk areas in our operations and supply chain. Our Investment managers have specific policies in this regard to ensure that they comply with requirements imposed on them under the Modern Slavery Act 2015. Measures to ensure we are compliant include:

- Requiring prospective suppliers to disclose their position on human slavery and trafficking and provide policies/statements as appropriate as part of the procurement due diligence process.
- Raising our own staff awareness through regular training and all colleague Compliance communications.

Key performance indicators

We have established a set of indicators to assess and report on the effectiveness of our actions in combatting modern slavery and human trafficking. These indicators include:

<u>Indicator</u>	<u>Performance Metrics (FY 2022/23)</u>
Staff training and awareness relating to modern slavery and human trafficking	370 employees

Number of reported incidents related to violations of human rights or unethical business practices in our operation	Zero
Number of reported incidents related to violations of human rights or unethical business practices in our supply chain	Zero
Onboarding of suppliers with our standards with regards anti-slavery and human trafficking requirements	Know Your Client checks completed on third parties includes these requirements.

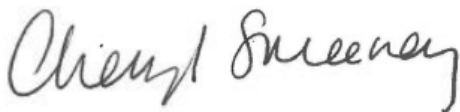
Training on modern slavery and human trafficking

All Antares staff have been made aware of the Modern Slavery Act 2015 and its requirements. We encourage employees and contractors to report any issues or concerns about potential violation of human rights, legal or regulatory requirements, and improper or unethical business practices such as fraud or bribery.

Antares educates its employees on the subject of modern slavery and human trafficking. Furthermore, all Antares employees are required to complete mandatory compliance training which covers essential standards related to modern slavery and human trafficking, including:

- Combating financial crime
- Complying with economic sanctions
- Ethical conduct and acting with integrity
- Managing conflicts of interest
- Promoting fair competition
- Upholding human rights
- Upholding our corporate responsibility

We review this training periodically to ensure that it incorporates new risks, laws and regulations. This statement is made on behalf of AGML and the companies within the Qatar Insurance Company corporate group for which it provides services (listed above and collectively referred to as “Antares”) and is made pursuant to section 54(1) of the Modern Slavery Act 2015. The AGML’s Board of Directors has approved this statement, and it constitutes Antares’ slavery and human trafficking statement for the financial year ending 31 December 2023.



Cheryl Sweeney, General Counsel
June 2024