

Anti-Slavery and Human Trafficking Statement

DAS UK HOLDINGS LIMITED
DAS LEGAL EXPENSES INSURANCE COMPANY LIMITED
DAS LAW LIMITED
DAS SERVICES LIMITED

1: Statement from senior management

DAS UK Holdings Limited and its subsidiaries, DAS Legal Expenses Insurance Company Limited, DAS Law Limited and DAS Services Limited (“DAS UK”) are committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain. DAS UK insists that the same standards that it promotes in combatting modern slavery are similarly adopted and enforced by its suppliers in order to adhere to the obligations and the intent of the Modern Slavery Act 2015 (“the Act”).

2: Structure of the organisation

DAS UK operates in the legal insurance and legal services markets together with ancillary and complimenting service streams. DAS UK is a subsidiary of ERGO Versicherungsgruppe AG which is in turn a wholly owned subsidiary of the Munich Re Group.

DAS UK operates primarily in the UK, and employs 750 people with annual turnover in excess of £200m. To find out more about our business, please click <https://www.das.co.uk> or <https://www.daslaw.co.uk>.

In order to deliver our services to business partners, clients and policy holders, we work with a range of suppliers from professional service organisations to suppliers of consumables. Irrespective of the services DAS UK receives from a supplier we insist that their obligations in respect of modern slavery and human trafficking must be to the same high standards as our own.

3: Practices

As part of our commitment to combating modern slavery, we have implemented the following practices:

- Notified and made staff aware of the importance of the Act;
- Identified how modern slavery may manifest itself in the work environment;
- Notified our suppliers of the importance of the Act as well as our stance on modern slavery and communicated our expectation of adherence by them to our standards.

4: Due diligence and Supply Chain Strategy

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures which include:

Implementing processes which require staff to procure goods and services through the approved supply chain;

Reviewing and where possible consolidating supplier numbers to reduce the overall amount of suppliers which assists in making the supply chain more manageable;

Where possible, assessing the origin of goods and services delivered through that supply chain specifically around the geographic origin of goods to assess whether these are high risk areas;

Undertaking risk assessments of suppliers to identify indicators which may raise concerns about the use by DAS UK of that organisation within the supply chain;

Carrying out appropriate levels of due diligence prior to entering into a new supplier relationship (i.e reference checking organisations in order to share knowledge of other client of the supplier);

Carrying out supplier audits on an ongoing basis to monitor changes which inform the checks set out above on an ongoing basis.

Our procedures are designed to:

- Control the number of suppliers, such that they are assessed and managed so that slavery and forced labour are not used in the supply chain;

- Influence the behaviours of suppliers so that the objective of the Act is achieved;
- Establish and assess areas of potential risk in our business and supply chains;
- Monitor those risk areas in our business and supply chains;
- Empower DAS UK to take positive and decisive action where breaches of the Act are identified or suspected.

5: Risk and compliance

DAS UK regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain as part of its supplier management procedure. Meetings take place on a regular basis, depending on the supplier, the nature of the goods and services as well as any indicator that greater regularity of review is necessary (i.e. where a supplier is sourcing from a location considered higher risk).

We do not consider that we operate in high risk sectors or locations because the majority of suppliers and business partners provide either professional / insurance services or goods delivered from within the United Kingdom. For the reasons set out in this document, DAS UK maintains a procurement process which seeks to ensure that reputable organisations are used in our supply chain, contractually commits suppliers to adhere to the standards DAS UK sets itself as well as affording DAS UK the right to audit and review the supply chain.

If we find evidence of a failure to comply with our standards in respect of Modern Slavery or a breach of legislation in this area we will immediately seek to terminate our relationship with the relevant supplier. Where there are suspicions of a breach DAS will take positive action to investigate and either terminate where proven, or work with the supplier to demonstrate with greater certainty that there is no such breach.

6: Training

We educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training, employees particularly in parts of the business which manage our supply chain, are encouraged to identify and report any potential breaches of the Act or suspicions of slavery and human trafficking within the DAS UK supply chain.

7: Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- consolidate further the number of suppliers to make managing and assessing their actions more manageable;
- at the start of any new supply contract seek to impose contractual obligations to tackle modern slavery and broad rights of termination for any such breach, as well as a right to audit their processes for compliance by them and their supply chain;
- undertake between 1 and 4 audits within the year in order to check our supply chain's compliance, the number will be dependent upon the nature of the goods or services supplied as well as the risk which the outsourcing team believe should be attached to each supplier.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes DAS UK's slavery and human trafficking statement for the financial year commencing 1 January 2020 and ending 31 December 2020.



Andrew Burke, Chief Executive Officer
For and on behalf of DAS UK Holdings Limited
Date: 19 November 2019