

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

## Purpose

The purpose of this Modern Slavery and Human Trafficking Statement is to set out Berkshire Hathaway European Insurance DAC (the **Company**)'s position on slavery, forced labour and human trafficking. Slavery, forced labour and human trafficking have no place in a modern society. The Company takes seriously its responsibility to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business and this statement constitutes our compliance pursuant to section 54(1) of the UK's Modern Slavery Act 2015 for the financial year ending 31 December 2023.

## Scope

This statement applies to all functions, divisions and branches of the Company. These are hereinafter collectively referred to as the **Company**.

## Organisational Structure

The Company is a designated activity company incorporated in Ireland and is a wholly-owned subsidiary of National Indemnity Company, an insurance company incorporated in Nebraska, USA, and is part of the Berkshire Hathaway Inc group of companies. The Company operates from its head office in Dublin and has branches in France, Germany, Italy, Spain, Belgium and the United Kingdom.

## Our Business

Our business consists of the underwriting of insurance and reinsurance business and associated policy and claims management.

## Our Supply Chains

The nature of our business is such that the Company's supply chain is limited. The Company does not act as a producer, manufacturer or retailer of physical goods and has no supply chain in support of such activity. The Company outsources to certain reputable professional companies in support of its underwriting and claims activities and uses services for the maintenance and support of its offices including reputable cleaning service suppliers.

## Modern Slavery & Human Trafficking Policy Statement

We are committed to ensuring that there is no modern slavery, forced labour or human trafficking in our supply chain or in any part of our business. Our Modern Slavery and Human Trafficking Statement reflects our commitment to being a responsible business which operates ethically and with integrity across all aspects of our operations, including our supplier relationships. We support human rights and anti-corruption and we also have an established Whistleblowing Policy.

## Due Diligence

The Company has a range of frameworks, policies and procedures for risk mitigation (including the risk of human trafficking and slavery) including:

- Compliance
- Risk Management
- Prohibited business practices
- Conduct and ethics
- Whistleblowing
- Prevention of financial crime
- Outsourcing.

All our suppliers are expected to implement a zero-tolerance approach to slavery, forced labour and human trafficking and comply with all local and national laws and regulations. We have introduced procedures designed to identify and assess areas of potential risk:

- Our procurement processes review details of relevant new supplier's compliance assessed through our supplier onboarding process including due diligence and, where applicable, Outsourcing Policy and related procedures .
- Suppliers are asked to provide confirmation that they have taken the necessary steps to comply with the UK Modern Slavery Act 2015.
- Procurement agreements requiring third party suppliers to comply with applicable laws and regulations and permitting the Company to terminate relationships where they fail to do so.
- Providing training and support for all staff on how and where they can raise concerns about wrongdoing and assurances that they will not suffer reprisals for doing so.
- Taking appropriate action where potential violations of the UK Modern Slavery Act 2015 are identified.
- Our Operations, Risk, Compliance, HR, and Legal teams work together to apply these standards to our business.

## Employees

Our Human Resources team is available to employees regarding any aspects of the terms and conditions of their employment. Our policies and procedures are designed to ensure that we are supportive to our employees at all times. Employees working in our business have their rights and responsibilities set out in their contract of employment and in the Employee Handbook.

## Approval

This Slavery and Human Trafficking Statement was approved by the Board of Directors on 2 April 2024. It will be published on the Company's website and will be updated on an annual basis.



**Karl Dooner**

**Chief Executive Officer**

## Version Control

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