



Hawthorn Life DAC

Slavery & Human Trafficking Statement

Slavery, forced labour and human trafficking have no place in a modern society. Hawthorn Life DAC (“HLD”) takes seriously its responsibility to ensure that there is no modern slavery or human trafficking in its supply chain or in any part of its business and this statement constitutes its compliance pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending December 2017.

Organisational Structure

HLD is a private limited company incorporated in Ireland. The company is a wholly owned subsidiary of Columbia Insurance Company, an insurance company incorporated in Nebraska USA and is part of the Berkshire Hathaway Inc group of companies. HLD operates from its head office in Dublin and has a branch in the UK.

HLD Business

HLD’s business consists of the underwriting of insurance and reinsurance business and associated policy and claims management.

HLD Supply Chains

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

Anti-Slavery Policy

HLD is committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any part of its business. HLD’s Anti-Slavery Policy reflects its commitment to being a responsible business which operates ethically and with integrity across all aspects of its operations, including its supplier relationships. HLD supports human rights and anti-corruption and also subscribes to a group wide Whistleblowing procedure

Due Diligence

HLD has a range of policies and procedures for risk mitigation (including the risk of human trafficking and slavery) including;

- Anti-Fraud and Bribery
- Anti-Money Laundering
- Outsourcing
- Whistleblowing procedures

All HLD's 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. HLD is introducing procedures designed to identify and assess areas of potential risk:

- HLD's procurement processes will review details of every new supplier's compliance assessed through our Outsource Policy requirements.
- Existing suppliers will be subject to annual review and asked to provide confirmation that they have reviewed their business operations and their supply chains for evidence of any instances of slavery, forced labour or human trafficking.

Employees

HLD's Legal & Compliance function is available to employees with regard to any aspects of the terms and conditions of their employment. HLD's policies and procedures are designed to ensure that it is supportive to its employees at all times. Employees working in HLD's business have their rights and responsibilities set out in their contract of employment and in the HLD Employee Handbook.

Training

HLD will ensure training and guidance is provided for those with procurement responsibilities to assess the human rights and labour performance of suppliers and will provide support to any colleagues who are required to work in countries where slavery and human trafficking is deemed to be a significant risk. HLD will raise awareness of its Anti Slavery and Human Trafficking Policy through staff communications, the induction materials for new employees and through the Employee Handbook.