

Modern Slavery Policy

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Policy Owner	Chief Risk Officer
Policy Administrator	Syndicate Compliance Officer
Access Rights	All Staff
Approval Requirements	ERS DGB Board
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Version	Date	Description
0.1	October 2016	Draft Guidelines
0.2	October 2016	Amended Draft Guidance following feedback from project team
1.0	October 2016	Finalised guidance
2.0	November 2018	Up-dated following review
3.0	November 2019	Annual review
4.0	January 2021	Annual Review

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1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. ERS has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any part of its supply chain.

1.2 ERS is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. ERS expect the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, ERS includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and ERS expect that its suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for ERS or on its behalf in any capacity, including employees at all levels, directors, officers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment.

2. RESPONSIBILITY FOR THE POLICY

2.1 The board of directors of ERS DGB Limited has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under its control comply with it.

2.2 The Syndicate Compliance Officer has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

3. COMPLIANCE WITH THE POLICY

3.1 The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all those working for ERS or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.2 Employees must notify their manager or the Syndicate Compliance Officer as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.3 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chain of any supplier tier at the earliest possible stage.

3.4 If an employee believes or suspects that a breach of this policy has occurred or that it may occur a report must be made to the appropriate line manager or report must be made as soon as possible in accordance with the ERS Whistleblowing Policy.

3.5 If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the ERS supply chain constitutes any of the various forms of modern slavery, it must be raised with the appropriate line manager or the Syndicate Compliance Officer.

3.6 ERS aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. ERS is committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of ERS supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any member of staff believes that they have suffered any such treatment, they should inform the Syndicate Compliance Officer immediately. If the matter is not remedied, and the member of staff should raise it formally using our Grievance Procedure.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Appropriate training on this policy, and on the risk to the ERS business faces from modern slavery in its supply chains will be provided as necessary to targeted staff.

4.2 ERS' zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 ERS may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.