

# Allstate Northern Ireland Modern Slavery Statement 2023

*This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 and pertains to the financial year ending 31<sup>st</sup> December 2023.*

## **INTRODUCTION**

Allstate Northern Ireland (ANI) is committed to reducing the risk of modern slavery, as defined by the *Modern Slavery Act 2015* ('the Act'), throughout our supply chains and business operations. ANI has a zero-tolerance approach to modern slavery and expects its staff and suppliers to raise any concerns immediately via the reporting channels provided.

## **STRUCTURE, NATURE OF BUSINESS, AND SUPPLY CHAINS**

Established in 1998, ANI is a limited liability company and subsidiary of the Allstate Corporation ('Allstate'), one of the largest property and liability insurance companies in the United States.

ANI provides a range of innovative, critical business support services to Allstate including technology, data, cybersecurity, legal and finance.

Our supply chains are limited due to the nature of our business. We do not produce, manufacture, or sell physical goods, nor do we provide IT services to the public. As such, we have no supply chain relating to such activities.

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

As part of our continuing commitment to combat modern slavery we maintain policies that facilitate the identification of modern slavery risk and detail the steps to be taken to prevent slavery and human trafficking from occurring in our business operations. Our policies include:

- **Global Code of Business Conduct:** declares who we are and what we stand for. It underscores our commitment to doing business not only legally but also ethically. This code provides the framework for the decisions we make and the actions we take every day, around the globe.

- **Supplier Code of Ethics:** outlines the standards and behaviours expected of our suppliers, which includes specific affirmations against forced or involuntary labour.
- **Anti-Bribery Compliance Policy:** this document reinforces and expands upon the guidance given in the *Global Code of Business Conduct*. It describes our policy prohibiting bribery and other improper payments in the conduct of business operations and explains employee responsibilities for ensuring implementation of the policy.
- **Speak Up! Policy:** we operate a *Speak Up!* process that allows employees and nonemployees to report any violations of laws and regulations, as well as violations of our *Global Code of Business Conduct* or company policies. All reports are fully investigated, and appropriate remedial actions taken.

## **DUE DILIGENCE PROCESSES**

ANI endeavours to mitigate the risk of modern slavery from occurring within our business and supply chains by implementing various due diligence processes such as:

1. Performing due diligence on new and existing business partners. We expect all our suppliers to share our approach to human rights and working conditions, and that they comply with all applicable health and safety legislation in the countries in which they operate.
2. Verifying that all new employees have the right to work in the UK.
3. Ensuring that all employees complete an annual compliance confirmation stating that they have read and understood the *Global Code of Business Conduct*.
4. Providing a telephone hotline and online reporting mechanism, with optional anonymisation, to every employee. ANI also has a strict anti-retaliation policy to protect employees who report a concern.

## **SUPPLY CHAINS**

Given the nature of our business and supply chains, ANI has a low modern slavery risk. Despite this, we have put in place processes to minimise this risk further. All current and prospective suppliers are expected to adhere to the requirements of the Modern Slavery clause in our *Professional Service Agreements* and the terms of our *Supplier Code of Ethics*. ANI suppliers are prohibited from subcontracting services to a third party without our consent.

## **EFFECTIVENESS OF OUR POLICIES AND PROCESSES**

Modern slavery risk is an evolving risk, and we continue to refine our approach to mitigating this risk on an annual basis. To measure the effectiveness of our approach we monitor the following indicators:

- Supplier contractual terms
- Supplier questionnaire responses
- Actions taken to strengthen supply chain
- Employee training levels

## **EDUCATION**

We are committed to refining our programme of compulsory compliance training for relevant employees and contractors on key modern slavery and human trafficking risk areas, including more engaging and effective training options.

We have focused on training our key procurement buyers to make them aware of the Act, and the drivers and indicators of modern slavery. We circulated our modern slavery statement to all employees through our internal communication channels and published information on modern slavery on our intranet.

## **BOARD APPROVAL**

This statement was approved by the Board of Directors of ANI, and is signed by:

**Stephen McKeown, Managing Director**

**April 2024**