

Allstate Northern Ireland Limited

Modern Slavery Statement 2019

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Allstate Northern Ireland during the year ending 31 December 2019 to prevent modern slavery and human trafficking in its business and supply chains.

INTRODUCTION

This is Allstate Northern Ireland Limited's third Modern Slavery Statement.

We are dedicated to serving and protecting people. It goes against everything we stand for to look the other way when we see human rights abuses or to knowingly contribute in some way to child labour, slavery or human trafficking.

We recognise and embrace our responsibilities relating to human rights, as an employer, purchaser of goods and services, investor and provider of insurance products and services.

We recognise slavery and human trafficking is a growing global issue which no business, industry or sector, be it private or public, is considered immune from.

Allstate Northern Ireland Limited and its parent company, The Allstate Corporation, have a zero-tolerance approach to modern slavery and all human right abuses of any kind in our operations and our supply chains. We take our responsibilities seriously and expect our staff to report concerns using appropriate reporting channels, and our management are expected to act on them.

ALLSTATE'S STRUCTURE, BUSINESS AND SUPPLY CHAINS

Allstate Northern Ireland Limited was established in 1998 to provide high quality software development services and business solutions in support of our parent company, The Allstate Corporation. We are Northern Ireland's largest IT company with over 2,300 employees across three sites in Belfast, Londonderry and Strabane. We are a major center for innovative software development, covering the full software lifecycle of design, development, maintenance and support.

Our supply chains are limited due to the nature of our business. We are not a producer, manufacturer or retailer of physical goods nor do we provide IT services to the general public and have no supply chain in relation to such activities.

2019 saw Allstate named for the fifth time as one of the World's Most Ethical Companies by the Ethisphere Institute. Allstate is one of only 130 companies representing more than 50 sectors worldwide to receive the World's Most Ethical Companies designation.

POLICIES AND CONTRACTUAL CONTROLS

As part of our continuing commitment to combat modern slavery we operate the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Global Code of Business Conduct:** lays out the values and principles of The Allstate Corporation and its subsidiaries. This code guides our shared purpose as a corporation and the things we do every day. It provides a roadmap for making decisions and ensuring we make the right choices, the right way, at the right time as we conduct our business.
- **Supplier Code of Ethics:** outlines the standards and behaviors expected of our suppliers wherever they are in the world where we conduct business, ensuring our value of operating with absolute integrity.
- **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.

Whistleblower Policy / Speak Up Process: We also operate a **Whistleblowing Policy** and **Speak Up process** principally aimed at our employees but also available to others working in our supply chain which encourages staff to report wrong doing which extends to human right violations like modern slavery. All reports are fully investigated and appropriate remedial actions taken.

- **Recruitment Policy:** We have a robust recruitment policy that includes conducting checks confirming eligibility to work in the UK and other countries in which we operate to safeguard against human trafficking or individuals being forced to work against their will.

DUE DILIGENCE PROCESSES

Allstate reinforces its commitment to prevent slavery or human trafficking from taking place within our business or supply chain through the following actions:

1. Incorporates affirmations against human trafficking, forced labour, and child labour, similar and consistent with this Statement, into the Allstate Family of Companies Global Code of Business Conduct as well as the Supplier Code of Ethics and supplier contracts.
2. Complies with all local and international labour laws where we do business and operate, often going above and beyond their requirements.
3. Performs due diligence on its existing business partners, as with future potential business partners to ensure suppliers share our approach to human rights and working conditions.
4. Expects a safe and healthy work environment. We expect our suppliers to comply with all applicable safety and health laws and regulations in the countries in which they operate.
5. Establishes processes for all employees to complete an annual compliance confirmation to the Global Code of Business Conduct, both as a new employee and annually thereafter.
6. Provides a telephone hotline and electronic reporting mechanism, including an anonymous option, to every employee to report any concern. Allstate also has a strict anti-retaliation policy to protect employees who report a concern.

LEGISLATION

We adhere to all local and international labour laws where we do business and operate. We are committed to providing a safe and healthy work environment and we expect our suppliers to comply with applicable health and safety laws and regulations in the countries in which they operate.

STEPS TAKEN BY ALLSTATE NORTHERN IRELAND IN 2019 TO ASSESS AND MANAGE RISK IN SUPPLY CHAIN

We recognize that there may be a risk of slavery and/or human trafficking through organizations with whom we contract for the supply of services or goods. We have undertaken several activities over the past three years to minimise the risk of modern slavery in our supply chain.

We aspire to be an industry leader in Modern Slavery by enhancing and communicating existing policies, our due diligence programme based on risk

assessment and effective follow up, employee and supplier training, and encouraging strong partnerships, stakeholder dialogue and transparency.

All Suppliers, who are or want to be a business partner to Allstate, 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, which incorporates the philosophies of this statement. Allstate suppliers are prohibited from subcontracting services to a third party without Allstate's prior knowledge, due diligence, and consent. Over the next 12 months we will continue to engage with our suppliers to gain further and deeper understanding into our supply chains.

ALLSTATE NORTHERN IRELAND SUPPLY CHAIN DUE DILIGENCE IN FOCUS

In 2019, we enhanced the questions we ask of suppliers, in relation to modern slavery, human trafficking, health and safety, and bribery to ensure we only partner with suppliers who uphold the same ethical principles as us.

Based on a risk assessment, we contacted 36% of our suppliers and asked them to complete our new revised questionnaire, exploring the efforts that they have made towards ensuring that no forms of slavery exist in their business or within their supply chains.

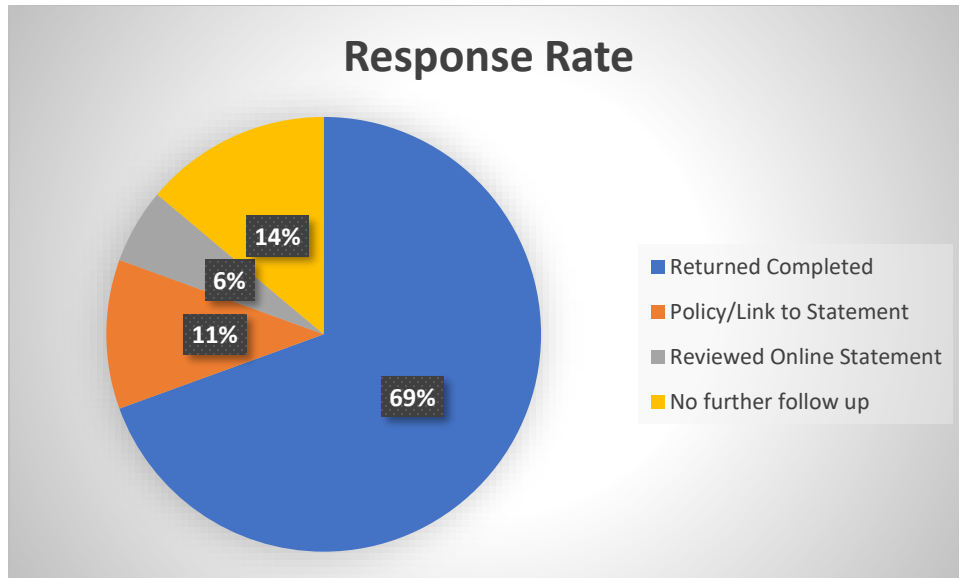
SUPPLIER QUESTIONNAIRE RESPONSE RATE

We received 24 completed responses a response rate of 69% of all suppliers audited.

We reviewed a further 6 online statements or links to policies provided in lieu of questionnaires replies.

5 suppliers did not respond after 2 follow up requests. These were reviewed and deemed to be low risk due to their location in the UK and the nature of their businesses. They will be included in subsequent year's survey requests.

In future years we intend to adapt the audit sample to ensure that emerging risk or new suppliers are included where appropriate.



We carefully assessed the responses received, to ensure we do not engage with suppliers who do not take their obligations seriously looking at industry, annual spend, country of operations, public perception and visibility of relationship.

TRAINING AND COMMUNICATION

To make employees 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 an article on modern slavery on our intranet.

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

ASSESSMENT OF EFFECTIVENESS IN PREVENTING MODERN SLAVERY

We understand that modern slavery risk is not static and we continuing to develop our approach to mitigating this risk on a year on year basis. We are committed to refining the controls that we have in place to prevent modern slavery and human trafficking.

To measure the effectiveness of our approach we will continue to report against the following identified key performance indicators in future modern slavery statements:

- Monitoring of contractual terms
- Supplier questionnaire returns

- Actions taken to strengthen supply chain
- Employee training levels

FURTHER STEPS TO PREVENT MODERN SLAVERY IN OUR SUPPLY CHAINS

As awareness of modern slavery grows we have formalised internal governance of modern slavery and human rights at both an operational and director level. Our Compliance and Risk team is responsible for monitoring our suppliers' compliance with our **Global Code of Business** and **Supplier Code of Ethics** and testing the success of our commitments to ensure that we meet our expectations.

Looking ahead to 2020 we will continue to monitor and review our modern slavery and human rights efforts to strengthen our commitment to ensure slavery and human trafficking do not occur in our supply chain.

We will strive to enhance our annual monitoring programme by working closely with our suppliers and business partners, by push for fairness and equality, wherever we operate around the globe, for the benefit of workers within Allstate and our supply chains. That is what our core values are about.

BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Act, has been approved by the Board of Directors of Allstate Northern Ireland Limited, and will be updated annually in line with the Modern Slavery Act 2015.

A handwritten signature in black ink that reads "John Healy". The signature is written in a cursive, flowing style with a long horizontal stroke at the bottom.

John Healy
Managing Director
Allstate Northern Ireland