

Modern Slavery Act Statement 2019

CNA Hardy - Modern Slavery Act: Slavery and Human Trafficking Statement

This statement is made on behalf of CNA Insurance Company Limited (**CICL**), Hardy Underwriting Limited, CNA Services (UK) Limited and CNA Insurance Company (Europe) S.A. (**CICE**) (together **CNA Hardy**) and constitutes CNA Hardy's slavery and human trafficking statement for the financial year ending 31 December 2019, pursuant to Section 54(1) of the Modern Slavery Act 2015 (the **Act**). In considering the challenges presented by the Covid-19 pandemic, CNA Hardy has delayed the publication of this statement by 6 months.

This statement describes the steps CNA Hardy has taken during the financial year ending 31 December 2019 to prevent any form of modern slavery and human trafficking from taking place within its business and supply chain. CNA Hardy has and will continue to maintain zero tolerance for modern slavery and human trafficking.

About CNA Hardy

CNA Financial Corporation (**CNA**) is the parent company of CNA Hardy. CNA is one of the largest commercial property and casualty insurance companies in the United States.

CNA Hardy offers specialist commercial insurance and reinsurance products to businesses of all sizes for domestic, international and global exposures through CICL, a UK insurance company, Lloyd's Syndicate 382 and CICE, a Luxembourg insurer with branches in Belgium, Denmark, France, Germany, Italy, the Netherlands and the UK.

Business and supply chains

CNA Hardy's supply chains include third party information technology service providers, insurance claims-related services, facilities management, and consultancy and professional firms specialising in such services as auditing, marketing, and legal and human resources.

CNA Hardy sources its core (re)insurance business predominantly through insurance intermediaries, the vast majority of which are regulated entities. It also underwrites (re)insurance business through coverholders pursuant to delegated underwriting authority agreements.

Policies on slavery and human trafficking

CNA Hardy's Code of Business Conduct for Brokers, Agents, Suppliers and Vendors (the **Code**) reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in its supply chain.

CNA Hardy requires all employees, officers and directors to comply with a Code of Professional Conduct which outlines its commitment to ethics, integrity and proper business conduct. This is reinforced by complimentary policies and procedures including Anti-Bribery, Conflicts of Interest and Whistleblowing, which encourage employees to report concerns about any conduct they consider to be inappropriate, illegal, unethical or fraudulent.

Due diligence processes

CNA Hardy's suppliers are procured in accordance with a Procurement Policy, which is designed to ensure that CNA Hardy enters into supplier arrangements with appropriate levels of review,

approval and continued oversight. Suppliers wishing to do business with CNA Hardy are required to enter into written terms of business agreements which stipulate the obligations of each party, including compliance with the Code. The suppliers are subject to a risk based due diligence process carried out by the Third Party Risk Management (**TPRM**) system. Key suppliers are subject to regular audits through the TPRM or manual reviews.

Modern slavery report

In July 2020, CNA Hardy prepared a modern slavery report which considered vendors engaged by the business. The findings showed that its business model represents a low risk of exposure to slavery and human trafficking and did not identify evidence of slavery or human trafficking in its supply chains. The report considered vendors' country of operation against the Corruption Perception Index 2019, published by Transparency International. There were no high risk vendors identified as part of this review. The report shows a lower risk profile than in many other industries. This can be attributed to the nature of CNA Hardy's business and its suppliers. CNA Hardy conducts an annual internal assessment to ensure that slavery and human trafficking are not taking place in its business or supply chain.

Engagement

CNA Hardy's directors have been briefed on the requirements of the Act. To ensure a high level of understanding of the risks of modern slavery and human trafficking in CNA Hardy's business and supply chain, all staff are appropriately trained. All employees at induction and at periodic points during their employment undertake relevant training, including in relation to Business Ethics and Whistleblowing.

Ongoing commitment

CNA Hardy will continue to evaluate the effectiveness of its policies and procedures in light of the Act in order to monitor and manage the risk of slavery and human trafficking in its business and supply chain. CNA Hardy will gather information from its suppliers during the procurement and audit processes regarding their awareness and adherence to the Act, and continue to ensure appropriate contractual provisions are in place in supplier contracts.

A handwritten signature in black ink, appearing to read "Jalil Rehman".

Jalil Rehman

Chief Executive Officer, CNA Hardy