

Slavery and Human Trafficking statement as required under s54, Part 6, of the Modern Slavery Act [1] 2015 for the 2018 financial year.

## 1. Introduction

Ambac Assurance UK Limited (“the **Company**”) is committed to ensuring that its business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

The Company is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

## 2. Organisation Structure

This statement covers the activities of the Company which is located in London and has 12 employees.

## 3. Relevant Policies

The Company operates a number of policies that mitigate the risk of modern slavery. These include the Company’s Recruitment and Diversity Policy; Compensation, Promotion, Redundancy, Retention and Succession Policy; and HR Manual.

4.1 Due Diligence: The Company follows procedures to ensure that all employees are legally entitled to live and work in the UK, as modern slavery often involves the exploitation of individuals who are not legally entitled to reside or work in a particular country.

### 4.2 Whistleblowing

The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can use the confidential helpline referred to in the Company’s Employee Handbook.

### 4.3 Risk Assessment / Supplier Chain Management

The Company is an insurer and therefore does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour.

As a general rule, contractors and suppliers used by the Company are therefore not likely to be susceptible to this risk. However, we are mindful that others may not always uphold standards to the same level as the Company. Consequently, employees responsible for managing suppliers and others involved with the Company are, themselves, responsible for ensuring that our values and ideals are upheld. For example, serious violations by suppliers will lead to the termination of the business relationship.

In light of the above, the Company deems the risk is low of slavery or forced labour existing in its supply chains.

#### 4.4 Recruitment and Selection

The Company uses only reputable employment agencies to source staff. As referred to above, appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

The Company does not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all workers to enjoy, include:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

#### 5. Measuring Effectiveness / Right of Audit

The Company's chief financial officer and office manager undertake an annual assessment of the basic working conditions of our staff and consideration of our ability to oversee controls discharged by third party suppliers.

#### 6. Staff Training

All staff are required to attend bi-annual employment law training led by the Company's solicitors (Clifford Chance). Beginning in 2019, this training will include a section on modern slavery and the Modern Slavery Act 2015.

This Statement was approved by the Company's Board of Directors on 5 March 2019.

Signed by:



---

John Tiff  
Director & Chief Executive Officer  
5 March 2019