

MODERN SLAVERY ACT 2015

STATEMENT

4th December 2024

Modern Slavery Act 2015

This statement is made on behalf of the Insurance Capital Partners group of companies ("ICP" or "the business").

We are publishing this statement to demonstrate our commitment to anti-slavery practices, ensuring that we always comply with our statutory obligation, operate in an ethical manner and uphold the principles of good corporate citizenship. ICP has a zero tolerance to slavery and human trafficking and is committed to these not being a feature of its supply chains.

About Us

ICP is a provider of insurance and investment services to its clients, which are a type of financial services products and services. ICP do not act as a producer, manufacturer or retailer of physical goods and we have no supply chain in relation to such activities.

ICP for the purpose of this policy includes:

- ICP Holdings Limited
- ICP Group Holdings Limited
- ICP General Partner Limited
- ICP Capital Limited
- ICP Investment Holdings Limited (Cayman Islands)

Policy and Procedures

ICP is committed to ensuring that those in the supply chain do not engage in slavery or human trafficking and regularly reviews its policies and procedures to ensure that they are up to date and reflect the current regulatory environment. ICP communicates this statement to all its employees to ensure that they understand the risks of modern slavery and human trafficking in the supply chains and to demonstrate a zero tolerance approach.

In addition to a periodic review of material outsourced arrangements, there are whistleblowing procedures in place to ensure that employees can raise any concerns that they may have including any concerns in relation to modern slavery and human trafficking.

Supply Chains

As a provider of insurance products and services to its clients, ICP have limited supply chains to support our business and so we consider the risk of modern slavery and human trafficking to be relatively low. Our business operates in diverse geographic locations including the United Kingdom, European Union and Cayman Islands. Suppliers provide a wide range of predominantly professional products and services to support ICP's business and we believe that this limited supply chain means the risk of modern slavery and human trafficking within it to be relatively low.

ICP expects its suppliers to operate the same high standards of corporate responsibility as are applied across our business.

Due Diligence

As part of ICP's procurement processes, consideration is given to the appropriateness of the supplier against a number of criteria, both quantitative and qualitative. Consideration is given as to whether the provider has adequate risk management processes and procedures, conduct risk controls, measures to combat financial crime (including bribery, money laundering and trade sanctions) and measures to combat slavery and human trafficking where appropriate. Suppliers are expected to adhere to all local laws and regulations.

This statement is approved by the Board of ICP and is reviewed on an annual basis.



Lord Geidt
Chair