



SLAVERY AND HUMAN TRAFFICKING STATEMENT for the year ended 31 December 2025

Approved by the Board on 8 June 2026 . Published June 2026

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ALOPUC Ltd (ALOPUC) and its subsidiaries (collectively called “Atrium”) slavery and human trafficking statement for the financial year ended 31 December 2025. It is reviewed annually.

ALOPUC does not accept any breach of human rights including slavery and human trafficking, and its main trading subsidiary, Atrium Underwriters Limited “AUL”, operates under a code of business principles and ethics (“code”). The code is AUL Board approved and the Atrium statement is aligned with the principles set out in the code. As a business we raise awareness with our staff to be alert to the risk, however remote, that we might become party to either slavery or human trafficking in our business and in the wider supply chain.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We are seeking to ensure that there is no slavery or human trafficking, as defined in the Modern Slavery Act 2015, in Atrium’s supply chains or in any part of our business. AUL’s business principles and ethics statement reflect our commitment to acting ethically and with integrity in all our business relationships. We have implemented and enforce effective and proportionate systems and controls to ensure slavery and human trafficking is not accepted anywhere in our supply chains. We include references to modern slavery in our induction training to new staff, our outsourcing policy to make sure consideration is given to the issue when we appoint third party suppliers, and in our whistleblowing policy so that staff can have the confidence to “speak up” if they have concerns around possible issues relating to slavery.

Organisational Structure

Atrium operates as part of a group of companies whose UK parent company is ALOPUC. We are based in London, and we have an office in the US. AUL is a long-established leading specialist insurance and reinsurance business, underwriting through Syndicate 609 at Lloyd’s. With effect from 1st January 2026 we established a new Syndicate numbered 2026 to develop new classes of business. Our staff and services are all employed through a group company, Atrium Group Services Ltd (“AGSL”). ALOPUC, AUL, Atrium Underwriting Group Limited (“AUGL”) and AGSL are all covered by this statement.

OUR SUPPLY CHAINS

ALOPUC’s business model and supply chain represent a low risk of exposure to slavery and human trafficking. AUL operates a specialist insurance and reinsurance business, that involves providing insurance cover in jurisdictions around the world; most of the supply chains involve insurance brokers or coverholders that are themselves regulated; however the supply chains also involve a wide range of third parties in firms that AUL pays for goods and services facilities management, professional services, other office services which tend to be low risk in AUL’s assessment. For these reasons, AUL considers that its business modern and supply chain represent a low risk of exposure to slavery and human trafficking.

When considering our supply chains, we focus on those firms who we pay for provision of goods and services. We source our insurance business through a range of worldwide brokers and placement of business to the syndicate will usually involve a Lloyd’s broker. These brokers derive their income from the client (the (re)insured), as such we do not consider our brokers to be a part of our supply chain in this context. That said we will only deal with reputable firms who are regulated by a local insurance regulator. This regulation will typically include an assessment of their fitness and propriety.



We also underwrite (re)insurance business through Lloyd's approved Coverholders located globally (most significantly in the UK, EU, US, Canada, Australia and South Africa). These firms act as our agents. As part of our due diligence performed when taking on a new coverholder we make an assessment of the likely exposure to slavery and human trafficking in the countries in which they will operate and seek assurance where relevant.

For certain activities we retain outsourced service providers to administer our affairs (e.g. claims handling, loss adjusting, policy processing) or provide outsourced support functions (e.g. investment management). Our Outsourcing Policy recognises the need for an assessment of the risk of exposure to possible slavery or human trafficking and we require commentary on how this risk is mitigated as part of the due diligence process prior to approval of all service providers. We require appropriate language to be set out in the service contract making clear how our supplier meets our expected standards in relation to modern slavery.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our supply chain assessment undertaken to identify and mitigate risk –

- We have a rolling timetable for the review of suppliers and outsourced providers to assess the risk they pose to our business. We use due diligence information gather and questions to support or assessment. Any material concerns would be reported through our governance structure and would form part of the consideration of renewal of the service contract.
- We review our list of Coverholders and risk assess them by country focusing on those operating in countries where slavery or trafficking is seen as a significant risk and understand whether there is a potential for exposure

TRAINING

To ensure the risks of modern slavery and human trafficking in our supply chains and our business are understood by our staff, we provide training and raise awareness using our intranet. We also provide awareness training to new recruits during their induction period. All staff receive whistleblowing training every 2 years which should promote the ability for them to raise any topics of concern relating to possible slavery.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have implemented metrics and monitoring to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. These metrics cover

- Control of outsource providers and their contractual provisions
- Training of staff and maintaining awareness
- Breach reporting of any notifications
- Statutory compliance of publishing and recording of the annual statement

Kirsty Steward

A handwritten signature in black ink, appearing to read 'K Steward', written over a light grey line.

Executive Director, ALOPUC Limited