

Allstate Northern Ireland Limited Modern Slavery Statement 2018

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 2018 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

This is Allstate Northern Ireland Limited's second 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 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 its parent company, The Allstate Corporation. Allstate is Northern Ireland's largest IT company with over 2,300 employees across three sites in Belfast, Londonderry and Strabane. Allstate Northern Ireland is a major center for innovative software development, covering the full software lifecycle of design, development, maintenance and support.

Allstate Northern Ireland supply chains are limited due to the nature of our business. We are not a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

Allstate was named in 2018 as one of the World's Most Ethical Companies by the Ethisphere Institute. This is the fourth year in which we have received that accolade. 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

Allstate Northern Ireland policies includes a **Global Code of Business Conduct** and **Supplier Code of Ethics**, which 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.

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.

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.
- 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.

Steps Taken by Allstate Northern Ireland since 2017 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 Allstate contracts for the supply of services or goods.

We have undertaken activity over the past two years to minimise the risk of modern slavery in our supply chain.

Our Sourcing and Procurement Solutions department continues to conduct careful due diligence to ensure that there is no apparent risk of slavery and/or human trafficking. Allstate seeks to engage only with reputable suppliers that do not engage in any form of slavery and/or human trafficking.

Following our 2017 modern slavery questionnaire we have focused on better understanding our supply chain including recruiters to the supply chain, sub-contractors, distribution, equipment and services.

Allstate aspires 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.

Assessment of effectiveness in preventing Modern Slavery

Allstate understands that modern slavery risk is not static and we continuing to develop our approach to mitigating this risk on a year on year basis.

To measure the effectiveness of our approach Allstate has identified the following key performance indicators and will be reporting on them in future modern slavery statements:

- Supplier questionnaire returns
- Steps taken to upskill high risk suppliers and assess their ability to identify and mitigate modern slavery in supply chain
- Actions taken to strengthen supply chain
- Employee training levels

Modern slavery training

Allstate Northern Ireland is now developing an employee training programme to be rolled out across the business and all employees will be trained by end of 2019.

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. The Compliance and Risk team are responsible for monitoring our supplier's 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 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.



John Healy
Managing Director
Allstate Northern Ireland