

Howden Group  
Holdings  
Slavery and Human  
Trafficking Statement  
2023

**HOWDEN**

This statement applies to Howden Group Holdings Limited and subsidiary companies (“the Group/we/our/us”) and is made pursuant to section 54(6) of the UK Modern Slavery Act 2015 (the “Act”). It constitutes the Group’s slavery and human trafficking statement for the financial year ended 30 September 2023.

## About the Group

Howden Group Holdings is a leading international insurance group with employee ownership at its heart. Founded in 1994, its trading operations comprise retail and specialty insurance broking, reinsurance broking, managing general agencies (“MGAs”), provision of employee benefit solutions and digital, data and analytic services for the insurance industry.

We are an international business, headquartered in London, with offices in 55 countries, including over 200 local offices in the UK & Ireland. We operate across Europe, Africa, Asia, the Middle East, Latin America, the USA, Australia and New Zealand, employing 16,000 people.

## Our structure

The Group has a devolved governance and operating structure with a central shared services function. Each business is managed in-country and in accordance with local governance and regulation. We have policies and procedures in place where relevant and required, and adapt these to best meet local regulation, requirements and practices, and to best manage our businesses and people.

Due to the nature of our business and the size of many of our offices, we operate a decentralised procurement model which utilises local buying and operational team members.

Our staff are engaged on full-time, part-time or flexible working arrangements and are appropriately remunerated and incentivised. Contractors may be employed by the Group from time to time, but these are largely professional workers for specific projects.

## Modern slavery

The Group remains committed to being a responsible business and recognising the importance of tackling the risk of modern slavery in our business.

We are committed to the welfare of all of our employees, including in terms of pay, working hours, environment, health & safety and wellbeing. We will not knowingly tolerate violations of basic human rights or employment practices by or against any employees, or within our supply chain.

As a professional service provider, we believe that insurance is not deemed to be a key risk sector as our employees work in roles that are primarily office based and/or generally require specialist qualifications. Therefore, we have assessed our risk of practices which might be considered to comprise modern slavery to be low.

We support the principles contained within the Universal Declaration of Human Rights and the International Labour Organization Core Conventions on Labour Standards.

## Our supply chain

Our supply chain primarily consists of professional, IT, insurance, and consulting services, along with property and purchased equipment, and our use of hospitality and travel providers.

We continue to evaluate the risks of each of our supplier groups and the most effective methods and procedures to identify and eliminate the risk of modern slavery or human rights breaches.

## Due diligence

We continue to work on programmes and initiatives across our business to embed the evaluation and communication of our modern slavery and human rights requirements into supplier selection and management activities.

In 2023, a vendor risk management tool was introduced to assess vendors including ESG risk. We have been bringing vendors onto the tool and we will continue to onboard our suppliers onto it. Where appropriate, vendors will then be subject to third party monitoring and will be required to complete due diligence questionnaires.

## Training

Training is available to staff members to understand the risks of modern slavery and human trafficking in our supply chains and business. This training covers an explanation of what constitutes modern slavery and high-risk areas, warning signs to be aware of and what action or steps to take in response. The Group continues to roll out the modern slavery module of this through compliance training for each business and their employees.

## Policies

The Group has a number of policies to mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations. The policies across the Group vary, but include: Code of Conduct, Whistleblowing, Grievance and Human/labour rights.

## Whistleblowing

The Group encourages all its employees, external third-parties or counterparties (e.g. 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 Group has its incident reporting details link displayed prominently on its website.

The Group's whistleblowing procedure is designed to make it easy for any individual to make disclosures without fear of retaliation. Employees who have concerns can use our confidential helpline through SafeCall. This independent reporting line is widely advertised across all offices and monitored by our Group Chief Risk Officer and Group General Counsel.

Alternatively, disclosures can be reported by employees notifying their line manager or a senior member in Human Resources, who will conduct or arrange for a senior individual to conduct an anonymous investigation. Otherwise, the individual may deem it appropriate to contact a legislative body, in which case examples of the relevant authorities are listed in the Group Whistleblowing Policy.

Across all disclosure routes, no calls or direct disclosures were made in 2023 in relation to modern slavery and trafficking.

## Looking forward

As we grow as a business, the importance, number and scale of relationships in our supply chains grow too. We continue to take steps to assess areas where modern slavery could be a possibility and look at the best and most effective mechanisms to manage these risks.

We will also build further on our supplier due diligence practices to assess and manage human and labour rights. In 2024, we will continue identifying opportunities to utilise the Ethical Trading Initiative base code practice and guidance, along with wider governance and environmental considerations.

In 2024, we will be working with a consultancy to review and update our Supplier Code of Conduct. This will set the expectations of our suppliers on key ethical, social and environmental principles including human rights and labour practices.

Our modern slavery and human trafficking statement for the financial year ended 30 September 2023 has been approved by the Board, as reflected by the Group CEO's signature below. Slavery and human trafficking statement as required under s54, Part 6, of the UK Modern Slavery Act 2015 for the financial year ended 30 September 2023.



David Howden, Group CEO

22 March 2024

The logo for HOWDEN, featuring the word "HOWDEN" in a bold, blue, sans-serif font. The letters are closely spaced and have a slight shadow effect. The logo is positioned on the left side of the page, partially overlapping a large, light blue circular shape that extends from the left edge.

**HOWDEN**