

Howden Group Holdings - Slavery and Human Trafficking Statement 2025

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 1 October 2024 - 31 December 2025.

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 of: retail and specialty insurance broking; reinsurance broking; managing general agencies; provision of employee benefit solutions; and digital, data and analytic services for the insurance industry.

Headquartered in London, with offices in more than 55 countries, including over 200 local offices in the UK & Ireland. Howden operates across Europe, Africa, Asia, the Middle East, Latin America, the USA, Australia and New Zealand, employing more than 25,000 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 regulations. 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.

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 our employees, including in terms of pay; working hours; environment; health and safety; and wellbeing. We will not 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 the sector 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.

We adhere to the highest standards of human rights and labour rights, ensuring fair and ethical treatment of all our employees and stakeholders. Our commitment is grounded in the principles contained within the Universal Declaration of Human Rights and the International Labour Organization Core Conventions on Labor Standards.

Supply chain

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

Due diligence

Our supplier risk management tool was introduced in 2023 to assess suppliers, including ESG risk. In 2024, we continued to bring more suppliers onto the tool, and we will continue to do so while also working with international entities to support its adoption. Where appropriate, suppliers are then subject to third party monitoring and will be required to complete due diligence questionnaires (DDQs).

To strengthen our approach to assessing and conducting due diligence of suppliers, in 2026 we will implement EcoVadis to support in the systematic assessment of labour, human rights and ethical risk across our global supplier base. This will include risk-based supplier segmentation, analysis of labour-practice indicators and automated monitoring of human rights risks. The tool will also enable us to identify and prioritise suppliers for enhanced due diligence based on factors such as geographic risk, category risk and supplier criticality.

As part of the onboarding of new suppliers, they will be required to understand and adhere to our Supplier Code of Conduct (the Code), unless they can demonstrate their internal code establishes equal or higher standards than those in the Code. The Code will outline our expectation that suppliers abide by standards and practices in relation to eradicating modern slavery and human trafficking including; not using slave labour, illegal child labour or forced labour; ensuring that all terms of employment are voluntary; and adhering to local laws in respect of minimum age requirements, wages, overtime and working hours.

Recruitment and selection

Our recruitment practices are designed to be fair, transparent and compliant with applicable employment legislation across the jurisdictions in which we operate.

Appropriate controls are in place to ensure that individuals undergo pre-employment checks prior to commencing employment. These include checking right-to-work documents, visas and passports. In the UK, we also verify that employees have supplied proof of address/residence to work in the country.

The Group is also actively adopting inclusive hiring practices globally by increasing line manager awareness and accountability of unconscious bias in the hiring process and therefore driving a more objective recruitment process. We also source candidates through diverse recruitment channels, aiming to increase the proportion of under-represented groups in the workplace. We only use specified, reputable employment agencies to source candidates. To ensure that the Group complies with Modern Slavery legislation, we mandate that agencies for both temporary and permanent workers enter into our agreements, which place obligations on those agencies to comply with all applicable laws, and provide us with their modern slavery policy, where applicable.

The Group does not employ individuals who 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.

Employment rights, working conditions & protections

The Group is committed to upholding high standards of human rights and labour rights, supporting fair and ethical treatment of all employees and stakeholders. Zero tolerance is maintained for any practices that compromise the dignity and rights of individuals.

Training

Modern slavery training and awareness materials are available to staff members to help build understanding of what constitutes modern slavery, warning signs to be aware of, and what action or steps to take in response. Learning is intended to support appropriate escalation. Where required, modern slavery training may be mandated for certain divisions or entities.

Policies

The Group has a number of policies to mitigate the risk of modern slavery and set out steps to be taken to prevent this in its operations.

Whistleblowing

The Group encourages all of its employees, 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 incident reporting details displayed on its website to allow for third parties, such as clients, suppliers and contractors, to report any cases of wrongdoing.

The Group's whistleblowing procedure is designed to make it easy for any individual to make disclosures without fear of reprisal. Employees who have concerns are encouraged to raise them by notifying their line manager or a senior member in HR in the first instance, who will conduct or arrange for a senior individual to conduct an anonymous investigation.

Where the matter is considered more serious, employees can submit details of their concerns directly in writing to the Group Chief Risk Officer, or by email/telephone through Safecall, which will provide a report onwards to the Group Chief Risk Officer.

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 2025 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.

Additionally in 2026, we are strengthening our commitment to addressing modern slavery and labour right risks by enhancing how employment standards are applied and overseen across the employee lifecycle. This includes completing an HR Modern Slavery Risk Assessment and further

embedding labour rights expectations through our Global Employment Standard Framework and Code of Conduct.

Together, these measures support a more coherent approach to managing modern slavery risks across our workforce and supply chains, and reinforce our commitment to fair treatment, transparency and responsible business practices as we continue to evolve.

Our modern slavery and human trafficking statement for the financial year ended 31st December 2025 has been approved by the Board on 21st May 2026, 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.

A handwritten signature in black ink, appearing to read 'David Howden', with a long horizontal flourish extending to the right.

David Howden, Group CEO

21st May 2026

The Howden logo is rendered in a bold, blue, sans-serif typeface. The letters are closely spaced, and the 'H' and 'D' feature thick vertical strokes. The logo is positioned on the left side of the page, overlapping a light blue square that is itself set against a larger teal square background.

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