



## Modern Slavery Statement for the year ended 31 December 2023

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 ('The Act') and constitutes the slavery and human trafficking statement for the financial year beginning 1 January 2023 and ending 31 December 2023 for the entities listed in this statement (the "**Hiscox Companies**"). Our previous statement can be accessed here - <https://www.hiscoxgroup.com/modern-slavery-act>

### **Our Commitment**

Hiscox is committed to maintaining a culture of integrity, transparency and accountability to ensure compliance with all applicable laws. This includes our ongoing commitment to ensuring that modern slavery and human trafficking do not take place in any part of our business or supply chain.

This statement sets out the steps that have been taken by the Hiscox Companies during the financial year ended 31 December 2023 to identify and respond to any modern slavery risks that might exist.

Our values guide our business: to have courage and integrity, to show ownership, to connect with our stakeholders and, above all, to be human. At the heart of our business is a desire to challenge convention and to always do better. This is evidenced in our approach to Modern Slavery and our commitment to continuously improve. These values have been fundamental in building Hiscox's reputation for upholding ethical behaviour in everything we do, which in turn support the morale of our staff and the results of the business.

Our business is answerable to all its stakeholders, including but not limited to our investors. The benefits of being a good corporate citizen go far beyond profitability. We strongly believe in the rule of law and we are committed to complying with all relevant international and local laws wherever we operate. We expect the same from our business partners, contractors and agents.

*"Hiscox aims to uphold the highest standards of integrity and human rights within our operations and supply chain. We regularly review the risks of modern slavery associated with our business and those we work with and we are committed to partnering with our stakeholders to eradicate it. This year we engaged an independent third party to run an additional audit of our internal processes so that we can build on our existing practice and identify further areas for improvement. Combatting modern slavery takes a collective effort and we are committed to playing our part."* – Aki Hussain, Group Chief Executive Officer

### **Our Structure**

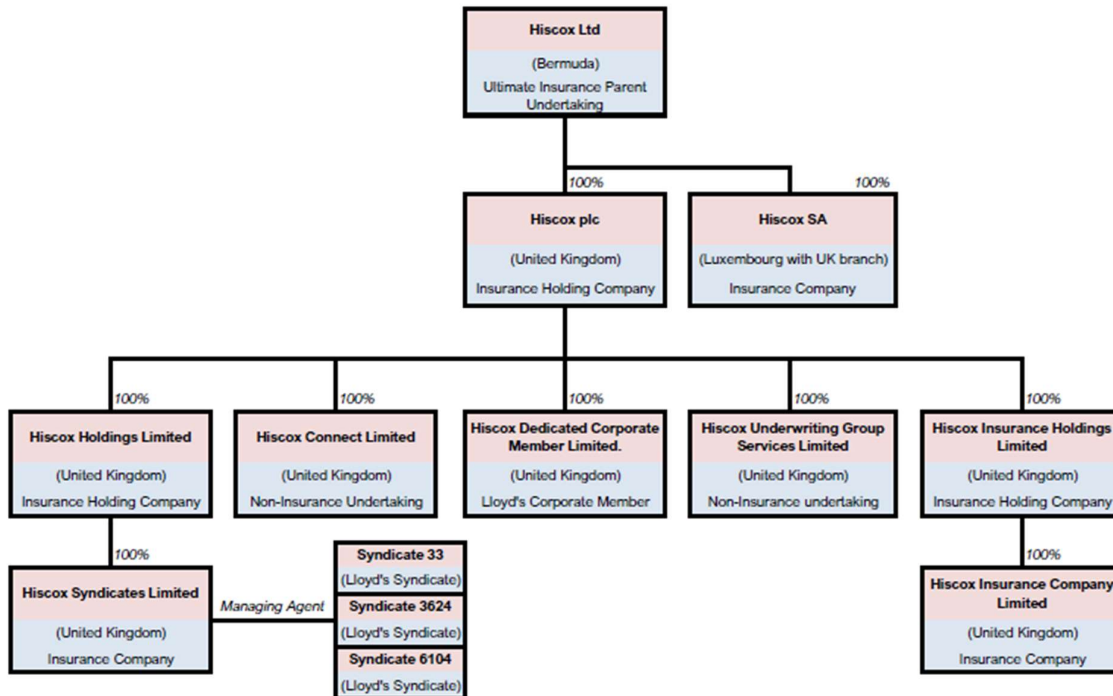
The Hiscox Group employs over 3,000 people with customers worldwide. We are headquartered in Bermuda and have offices across 14 countries including: Belgium, Bermuda, France, Germany, Guernsey, Ireland, Luxembourg, Netherlands, Portugal, Singapore, Spain, Thailand, United Kingdom and the USA.

Through our insurance businesses in the UK, Europe, Asia and the USA, we offer a range of specialist insurance for professionals and business customers as well as homeowners. Internationally traded, bigger ticket business and reinsurance is underwritten through Hiscox London Market and Hiscox Re & ILS.



The following subsidiaries of Hiscox Ltd, the parent company, are covered by this group statement (the Hiscox Companies):

- Syndicate 33
- Syndicate 3624
- Syndicate 6104
- Hiscox Dedicated Corporate Member Limited
- Hiscox Underwriting Group Services Limited
- Hiscox Syndicates Limited
- Hiscox Insurance Company Limited
- Hiscox Holdings Limited
- Hiscox PLC
- Hiscox Insurance Holdings Company Limited
- Hiscox Société Anonyme.



## Our Policies

We have a number of policies that mitigate the risk of slavery and human trafficking, guided by the principles of the UN's Universal Declaration of Human Rights and the International Labour Organisation's core labour standards.

The Hiscox Supplier Code of Conduct is mandatory and requires that our suppliers act in congruence with our values relating to good corporate citizenship. Any breach of the Supplier Code of Conduct is unacceptable and in the rare occasions this occurs we work swiftly with our suppliers to identify and address root issues and enhance our practices to ensure the underlying issues do not reoccur..

Our culture encourages employees to raise any concerns relating to malpractice or wrongdoing, including issues related to slavery and human trafficking, without threat of unfair treatment as a result. If an employee has a serious concern relating to the operation of the business, we have a Whistleblowing Policy and Whistleblowing Procedures that enable that person to confidentially raise their concerns.

During 2023, as part of our annual review cycle, we updated our Whistleblowing Policies and Procedures to align with the latest regulatory guidance and expectations, as well as to incorporate feedback on best practice received from an external provider. We also enhanced our overall whistleblowing framework by engaging an external service provider to give staff and other stakeholders the option to raise concerns outside of the existing internal channels, either through an independent phone line with multi-lingual capabilities, an independent email, or a secure confidential web portal. Employees also have the option to raise their concerns with the Chair of the Hiscox Ltd Audit Committee. In addition, all staff worldwide can access free, confidential advice from an external service provider in relation to any concerns about possible malpractice or wrongdoing in the workplace.

The following policies underpin our efforts to ensure that we are addressing the risk of modern slavery across the business.

- Our Supplier Code of Conduct
- Grievance Procedure and Whistleblowing Policy
- Diversity, Equity and Inclusivity Policy
- Equality Policy
- Anti Bribery and Corruption Policy
- Responsible Investment Policy
- Financial Crime Policy: covers sanctions put in place by governments and organisations (e.g. United Nations) to restrict trade activity with particular people, companies, territories and/or trade sectors to achieve a particular political aim (such as improving human rights or preventing nuclear weapons development)
- Hiscox Group Outsourcing Policy
- Data protection & Privacy Policy

Ultimately our Group CEO has responsibility for all the policies listed above, many of which are also signed off and approved by our Group and Subsidiary Board of Directors. Ongoing improvement and embedding sits with the associated Group functions. Adherence to our policies and standards are monitored by our Risk Management and Compliance teams.

We continue to develop Hiscox's overall human rights and sustainability strategies which will include provisions to continue to identify and prevent modern slavery. Our Group CEO will sign off on this strategy whilst the responsibility for its development sits with our Group General Counsel & Company Secretary and our Sustainability Manager. In 2024, we plan to publish our Human Rights Policy and roll-out a Group Code of Conduct internally, both of which will support this statement.

### **Risk management**

We are committed to ensuring that slavery and human trafficking do not exist within any part of our business or our supply chains. Although we procure services from a wide range of suppliers who support us in the fulfilment of insurance claims and carrying out our business activities, based on our initial risk assessment we consider the exposure to slavery and human trafficking-related supply chain risk to be limited by a low reliance on sectors, countries or regions which are at heightened risk of slavery and human trafficking. We are, however, aware that the risk of modern slavery is higher in some of the countries we operate in, for example Thailand, and we intend to factor this into our risk management system which will be strengthened in the coming year.

Our procurement process requires that prior to entering contracts with suppliers, our procurement team assesses the services a supplier provides and the associated risk and delivers the appropriate due diligence. During 2023, we began embedding EcoVadis, a global ESG platform within our procurement function starting with all new suppliers in our high spend / risk categories, which will enable us to gather further supplier data and insight, and develop our Key Performance Indicators (KPIs) in this space. To date we have captured 150 of our current suppliers through EcoVadis which all fall into our categorisation of high risk and spend.



Within our business, we are aware of risks associated with outsourced services such as logistics, canteens, cleaning and waste management. All outsourced service providers are subject to our standard procurement process. In addition, our Responsible Investment Policy sets out the high level responsible investment principles implemented within Hiscox's investment portfolio by our in-house investment team.

### **Due diligence**

In keeping with our commitment to ensuring that modern slavery and human trafficking does not take place in any part of our business or supply chain, we continue to mitigate the supply chain risk by strengthening our supply chain practices. We will not support or engage suppliers where we are aware of slavery or human trafficking in either their business or supply chains.

In addition to undertaking appropriate due diligence of suppliers as part of the on-boarding process, and at regular intervals thereafter, we have additional controls for contracts with suppliers that represent our most significant expenditure.

During 2022, we implemented the Financial Services Qualification Scheme (FSQS) operated by Hellios, a market leading supplier due diligence community which is used by over 50 other Financial Services organisations. FSQS provides a standard and simple mechanism for collecting and managing supplier assurance information across the Group and across the wider Financial Services community. FSQS is an integral part of our sourcing process. Our Sourcing Specialists use the system to find pre-qualified suppliers to be considered for new business. Qualified supplier status gives visibility across our Procurement process and, therefore, creates potential new opportunities.

FSQS is a two-stage process, with Stage 1 assessing the risk of the supplier including access to customers, location of services, access to data, etc. All risk responses are reviewed, including forced labour and modern slavery. If the supplier is deemed to be low risk, the process stops after Stage 1. For all other suppliers that must move on to Stage 2, they must answer a variety of questions linked to risk, including questions relating to modern slavery.

During 2023 we also implemented EcoVadis, a global ESG platform. At the point of tender, all suppliers are notified that they may be selected and required to complete the EcoVadis assessment. Hiscox reviews the reports of these suppliers which can identify any gaps or incidents of note. No incidents have been found, but if one is identified the relevant risk functions would be notified and the issues would be addressed with a prompt and thorough review. Both of these partnerships enhance our supplier due diligence assessments and incorporate modern slavery.

We continue to monitor our whistleblowing channels to identify any reported cases of modern slavery or exploitation of workers. In addition, the Board and the Audit Committee – whose Chair also serves as the Group's whistleblowing champion – have oversight of whistleblowing matters and receive reports arising from its operation. The Company's whistleblowing policy is designed to ensure that the workforce feel empowered to raise concerns in confidence and without fear of unfair treatment. The structures and processes in place allow for the proportionate and independent investigation of any such matters, and for appropriate follow-up action to be taken where necessary. The policy applies to both our employees, suppliers and agency workers. This policy is communicated to our suppliers through our Supplier Code of Conduct and can also be found on our website.

Hiscox also has an internal grievance procedure which addresses problems that may arise during the course of employment. This procedure aims to resolve issues quickly to the satisfaction of all concerned.

### **Training**

All our employees undertake annual mandatory regulatory training which includes specific content on raising concerns within the business.

During 2022, we reviewed the training requirements for the business relating to modern slavery and



human trafficking. We contracted with an external company to deliver an enhanced and focused modern slavery training module during 2023, and 155 of our business leaders, risk managers, office managers, and our procurement team completed the training.

Additionally, our procurement team, of approximately 20 employees, and several super users received training on the use of the EcoVadis system. This training included how to work with suppliers and how to access supplier data and scorecards on their ESG profile, including labour issues, environmental ethics and responsible procurement matters.

**Monitoring and effectiveness**

No instances of non-conformity with the Supplier Code of Conduct were reported through any of our whistleblowing channels in 2023.

In 2023 there were no suspected cases of Modern Slavery reported through the Whistleblowing channel, however, we remain diligent in monitoring our business and suppliers to ensure slavery and human trafficking do not feature in our business or supply chain.

Should any such incident occur, our policy prioritises fair and objective investigation so that those who have experienced adverse impacts gain access to appropriate remedy.

We are committed to transparent reporting of our progress in addressing modern slavery risk. We are in the process of enhancing our KPIs, which will help us ensure compliance with our standards across our value chain and identify any areas that need further work. The KPIs will align with our purpose; we believe in building a clear, fair and inclusive business so that we can build better, together.

Some of the metrics we currently use are noted in the table below.

Key Performance Indicator	Data	Context
Number of current suppliers onboarded on EcoVadis falling into our categorisation of high risk and spend	150 suppliers	Suppliers already on the EcoVadis platform or falling into a high risk and spend category required to complete EcoVadis
Number of targeted training modules undertaken.	155	Targeted training of our business leaders, risk managers, office managers and procurement team will be increased by 5% during the next financial year.
Number of cases reported through Whistleblowing channel	0	In 2023 there were no suspected cases of Modern Slavery reported through the Whistleblowing channel.

**Looking forward**

We recognise that tackling modern slavery risk is an ongoing issue and Hiscox will continue to develop and improve our approach to respecting human rights and preventing modern slavery across its operations and supply chains. We have engaged with third party experts Ardea International, specialist consultants focusing on Modern Slavery Risk, to assist us with Human Rights and Modern Slavery best practice and the associated review of our Modern Slavery Statement. Ardea will also assist with a more detailed gap analysis to help us further strengthen our practices in relation to Human Rights and Modern Slavery.



We will seek to collaborate and partner with external experts to share best practices and seek to mitigate the risk of modern slavery.

During the next reporting year we will:

- Review and update our policies to ensure they address the risk of modern slavery and human rights
- Continue to mitigate our supply chain risk by strengthening our supply chain practices.
- We have identified the need to carry out a risk assessment across our own operations, supply chain and investment portfolio
- Continue to review and enhance our Whistleblowing Policy and Procedures against best practice and regulatory standards
- Enhance our due diligence processes, including procurement processes to address risk highlighted in a formal risk assessment
- Enhance KPIs to monitor our progress in addressing modern slavery risk
- Ensure that training takes place annually and expand our training to ensure that it is tailored to specific roles and responsibilities
- Undertake a modern slavery gap analysis across our business and supply chain management to identify areas to strengthen

A statement relating to the previous financial year will be published on an annual basis and published on the Hiscox Group website, [www.hiscoxgroup.com](http://www.hiscoxgroup.com).

This statement has been approved by the Hiscox Ltd Board of Directors on 27 June 2024 and signed on its behalf by:

**Aki Hussain**

Hiscox Group  
Chief Executive  
Officer  
28 June 2024

**Publication date:** 28 June 2024