

Modern Slavery Act statement for 2026:

In this statement, the 'Group' refers to Benefact Group plc together with its subsidiaries. This statement covers the companies within the Benefact Group which are in scope under Section 54 of the Modern Slavery Act 2015: Ecclesiastical Insurance Office and Lloyd & Whyte Group Limited.

The Group is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chains.

"Increasing scrutiny of supply chains is good for business. It ensures businesses are fully aware of exactly who they are working with and how they are conducting themselves and it gives consumers the confidence that the business community is collectively setting higher standards. We expect high standards of responsible business from our own business, and we expect no less from the partners we choose to work with. We're committed to continually improve the standards and practice in our supply chains." *Mark Hews, Group Chief Executive*

Structure of organisation

The Group is a specialist financial services group providing insurance, broking and advisory and investment products and services. The business is predominantly UK-based with overseas operations in Canada, Australia and Ireland. Over 2,000 people are directly employed. The Group is owned by a charity, Benefact Trust, with all available profits going back to charities and good causes.

In 2025, the Group reported a profit before tax of £77.1m. Find out more about our business and the Group in our [Annual Report & Accounts](#).

Our UK supply chain is managed centrally by a dedicated team of procurement specialists within our Finance and Claims departments. Supply chain relationships for our overseas businesses are managed locally.

Policies

We have a number of policies that underpin our efforts to address the risk of modern slavery across the business and our supply chains. The most relevant include:

- Procurement Policy and an Outsourcing Policy which ensures centrally managed suppliers go through the appropriate checks and scrutiny.
- [Guide for Suppliers](#), which ensures all suppliers aware of and subscribe to our high expectations and standards.
- Whistleblowing Policy and Procedures that enables employees to confidentially raise their concerns, including issues related to slavery and human trafficking.
- Health & Safety and Welfare Policy which ensures health, safety and wellbeing are core consideration at all levels. Especially important is a focus on a no-blame culture, where colleagues are encouraged speak out about any unsafe conditions, activities or behaviours.

- Employee Code of Conduct, which sets out our shared commitment to acting with integrity, speaking up and reporting concerns. Our annual Code of Conduct training is completed by all employees.
- Recruitment processes and policies which ensure employment and recruitment processes are in line with recognised good practice and that colleagues are supported and rewarded appropriately.

Due Diligence

The group expects and requires its suppliers to uphold our high standards. Our established procurement process includes rigorous due diligence. Specifically relevant, we:

- consider modern slavery risk as part of our due diligence at renewal for all relevant suppliers;
- consider modern slavery risk as part of our due diligence for all UK claims suppliers; and
- ask all new suppliers whether they match our commitment to pay the living wage.

We use the Financial Services Qualification Scheme (FSQS) operated by Hellios, a market leading supplier due diligence community. FSQS provides a mechanism for collecting and managing supplier assurance information and supports our due diligence processes.

Contract Relationship Managers complete an annual attestation for the contracts for which they are responsible, ensuring standards outlined in our policies are being maintained.

Through our sustainability assessment, the EdenTree Standard, all companies we invest in are assessed for their impact on People – including “Decent Work” and “Human Rights”. This includes assessing how companies uphold core human rights and decent work practices across their operations and supply chains.

Risk assessment and management

As a provider of financial services, we do not operate in a sector which is considered to be high risk, nor do we purchase goods or services from organisations which we would associate with modern slavery or human trafficking.

[The Walk Free Foundation’s Global Slavery Index \(GSI\)](#), and [Alliance Bernstein’s Framework for Mapping Modern Slavery Risk](#) provide data that help us assess our exposure and categorise our risk as low.

Training

Our annual Code of Conduct training is completed by all employees and includes acting with integrity and speaking up and reporting concerns.

Giving and influencing

The Group’s purpose and charitable ownership mean it has a unique opportunity to create a positive social impact. Through our giving we have supported organisations working to eliminate modern slavery. This includes a £150,000 grant from our charitable owner, The Benefact Trust, to the Clewer Institute, who support church networks to detect modern slavery in their communities. The grant enabled a new website and larger communications campaigns that will help mobilise the church to take action against modern slavery.

In 2025, we recognised Unseen UK at our Charity Heroes Awards. The charity provides safe housing and support for survivors and operates the UK Modern Slavery & Exploitation Helpline. We were delighted to showcase their work at our awards event and support with a donation. We are continuing to engage with Unseen UK and will use their expertise to ensure we're aligned with best practice.

Through our responsible and sustainable investment business, EdenTree, we also continue to support a range of initiatives to influence business behaviour on modern slavery. This included signing a collaborative letter sent to UK companies non-compliant with the Modern Slavery Act as part of the Votes Against Slavery coalition.

Monitoring and effectiveness

During 2025 no suspected or confirmed instances of modern slavery were identified within our business or supply chain. Nevertheless, we're committed to continuous improvement and will regularly review our policies, processes, and support materials.

Sign off

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year commencing 1 January 2025 and ending 31 December 2025.

Mark Hews
Group Chief Executive

Statement ENDS