

## Modern Slavery and Human Trafficking Statement May 2025

### Introduction and Scope

Modern Slavery is a term used to cover slavery, servitude, forced or compulsory labour and human trafficking. Modern Slavery is a crime and a violation of human rights. This statement is published by the Charles Taylor group of companies, and it extends globally to all our wholly and majority owned entities within the Charles Taylor Group (the “Group” or “Charles Taylor”).

This Modern Slavery and Human Trafficking statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (the “Act”). It sets out the Group’s approach, policies, procedures and actions to combat Modern Slavery in its various forms.

### Commitment

Charles Taylor is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

This commitment requires us to assess human rights risks in all our businesses and resulting from our operations. We do this by considering equality, corruption and bribery, child labour, forced labour, slavery, trafficking, discrimination, health and safety and working conditions.

### Organisation, Markets and Structure

Charles Taylor provides an unrivalled and growing range of insurance services, claims and technology solutions across the globe, specialising in complex situations requiring distinctive technical expertise and technology.

We operate through several business units organised under three areas: -

- **Charles Taylor Claims Solutions** – delivering loss adjusting, end-to-end claims programme management and related technical services that combine technical expertise, process efficiency and solutions to optimise claims outcomes for clients and reduce their risk.
- **Charles Taylor Insurance Management** – offering end-to-end management of insurance programmes and processes on a long-term partnership basis.
- **Charles Taylor InsureTech** – offering a range of SaaS (‘Software as a Service’) capabilities, through InHub, a cloud-based hub that are designed to solve specific problems faced by participants in the insurance value chain.

The Company operates globally in over 110 locations in over 30 countries. To find full details of our office network please visit: [www.charlestaylor.com/en/about-us/locations/](http://www.charlestaylor.com/en/about-us/locations/).

### Governance

The Board of Directors is responsible for setting out the Group’s overall strategy and operating model. It sets the tone on the business ethics and culture expected of our Group. The Executive Committee is responsible for the overall management/running of the Group and for overseeing the implementation of agreed Group strategy in line with the operating model.

The Group President, Steven Beard, who is a member of the Executive Committee, is responsible for the Group meeting the standards set out in this statement. The Group’s Risk Management Framework provides the necessary foundations and organisational arrangements to manage risk across Charles Taylor.

The Group Risk Management Framework is designed to identify:

- the Principal Risks to the Group achieving its strategic objectives
- the target outcome by which risk mitigation will be considered a success
- the existing high-level control processes in place and the owners of those controls
- the additional mitigating actions required to reduce the risk and assist in achieving our objectives

We take our responsibilities in complying with the legal, regulatory and policy development responsibilities seriously and we understand that these are important in helping us uphold human rights and address any breaches or violations of these rights promptly.

In order to assist us we have developed the following:

- Policies: We have developed policies that apply to our operations and our people, outlining the standards and specific behaviours that we expect.
- Communication and training: We provide training to our employees on company policies and on specific areas of risk faced by our businesses.
- Risk assessment: We have developed a risks and controls framework to understand our weaknesses and to assess the strength of our controls.
- Monitoring and Reporting: We report regularly on our control activity and any issues to the relevant governance forums.
- Whistleblowing: We have procedures in place to ensure that all staff can highlight failures to meet policies or regulations.
- Public Disclosure of our control framework and of our approach to specific issues or obligations (e.g., Gender Pay, Modern Slavery).

The application of each of the above areas of control activity to the area of Modern Slavery and Human Trafficking is outlined below.

## **Our Policies relating to Modern Slavery and Human Trafficking**

The Group's Global Policies apply to all Charles Taylor operations and employees, irrespective of where they are based or deployed. We review our policies on a regular basis (at least annually) to ensure that they remain fit for purpose. Our policies relate to the Group's relationships with our staff and those who come into contact with the Group; they support the promotion and maintenance of a consistently high standard of business ethics.

We believe that high standards of business ethics and a consistency of approach can add value to our operations and further enhance our reputation. Here we have set out our approach, reflecting our attitudes, adopted processes and our progress in maintaining an ethical and responsible business.

The policies and other documents that are relevant to our ongoing efforts to avoid Modern Slavery and Human Trafficking within our operations are as follows:

- Our Corporate Values – These set the overall tone for what is expected of Charles Taylor operations and employees.
- Professional and Ethical Standards Policy – In this document we explain the ethical behaviours expected of all Charles Taylor staff.

- Equal Opportunities – Here we outline measures to ensure that Group staff are treated fairly and without discrimination.
- Health and Safety – This policy communicates how we manage the safety and wellbeing of our people and our clients where applicable.
- Onboarding and Due Diligence procedures – These set out our expectations and requirements when working with Third Parties and the process relating to oversight and monitoring.
- Data Protection Policy – This policy sets out our approach to protecting the data we hold, including our own data and information that is entrusted to us by others.
- Group Procurement Policy – requires our supply chain and joint venture partners to operate within the framework of our suite of policies including this Modern Slavery and Human Trafficking Statement.

## Communication and training

We believe that continuously training our staff is a key control in mitigating risk. The Group uses different tools to ensure that our standards and policies are communicated to – and understood by – our people. As part of our induction process, we communicate the policies to any new staff joining and record their reading and understanding of the same. All mandatory training takes place annually. This is monitored across the Group and compliance reported to the management team.

Updates to these policies are communicated proactively as appropriate via the Business Management System for mandatory review and re-acceptance.

## Risk Assessment

**Overall:** we continually assess our exposure and the potential for exposure to risks and have a control and reporting framework to communicate any issues that we identify as part of our monitoring. This includes an assessment of the risk of our operations possibly using or being involved in slavery and human trafficking activities. We have assessed that this risk is low. As a provider of professional and technical services, we are not a direct manufacturer or supplier of goods. Our staff generally have a high level of technical capability and professional qualification.

**Risk assessment of our Supply Chain:** our supply chain does not have a need for a high degree of manufacturing or a low wage labour-intensive resource. Our main exposure for potential slavery and human trafficking risks exists through the maintenance and support of our IT and property-related infrastructure or purchase of IT hardware or building-related supplies manufactured in circumstances that suggest such potential risks.

To manage this risk, we have an established procurement function to ensure consistent application of the Group's policies through the procurement process, into our supply chain and subsequent ongoing centralised oversight and monitoring of Charles Taylor's supplier/ vendors.

All contracted partners wishing to work with Charles Taylor must demonstrate their commitment to our culture, policies, and processes, and in particular adherence to the Act, alongside other key cultural elements such as Diversity & Inclusion and Environmental Corporate Governance.

We take particular care to ensure that our service partners pay their staff fairly, and as an example in our UK offices all third-party workplace-related vendors are required to pay their staff the minimum "living" wage, and in the capital the London Living Wage.

For certain projects and in certain countries which we believe have the potential for additional exposure, a specific and full risk assessment is carried out.

## Reporting

The Group Assurance teams have a direct role in compliance with the law, regulation, and our own standards. These include our Group Risk, Compliance, Internal Audit, Legal, Data Privacy and Information Security teams. We also have individual teams within our client facing businesses which are responsible for ensuring compliance by working within our standards.

Each of these teams are responsible for risk assessing and reporting any potential or actual incidents of non-compliance, including our Modern Slavery and Human Trafficking obligations.

No issues of non-compliance with our Modern Slavery and Human Trafficking obligations were reported by our various control functions during 2024, or in prior years.

## Whistleblowing

The Group encourages members of staff to maintain high standards of behaviour and to report any wrongdoing that falls short of this fundamental principle. Our Whistleblowing Policy aims to ensure that any member of staff who raises concerns in good faith can do so on a confidential basis without fear of reprisal or victimisation, and in the knowledge that their concerns will be taken seriously and investigated appropriately. The Policy applies to all global employees of Charles Taylor and its business units, divisions and subsidiaries everywhere we operate.

No issues of non-compliance with our Modern Slavery and Human Trafficking obligations were reported via our Whistleblowing Procedures during 2024, or in prior years.

**Continuous Improvement** Whilst we believe our exposure to risks relating to Modern Slavery and Human Trafficking is low, we recognise that all businesses have a duty to ensure that this topic receives continual and appropriate attention and that we remain diligent in our efforts to reduce slavery and trafficking in all its forms. We shall continue to assess our risks both internally and through interaction with our partners, both current and future.

We are committed to doing the right thing when it comes to doing our part in reducing slavery and human trafficking. We aim to do this by:

- Educating our management teams and staff to ensure that our controls and risk assessments meet with our high standards.
- Assessing the risks posed by our supply chain.
- Continuously evaluating our policies and training programmes to ensure they remain relevant and appropriate to the level of risk we face.

Approved on Behalf Of: -  
Charles Taylor

**Steven Beard**  
Group President  
21 May 2025