

Modern Slavery Statement Financial Year 2025

This statement is made on behalf of Hippo Digital Limited (Hippo), pursuant to section 54(1) of the UK Modern Slavery Act 2015. It sets out the steps taken to mitigate the risk of modern slavery occurring within our business operations and supply chain.

This statement is reviewed on an annual basis following the financial year end on 31st March. This statement covers the financial year to 31st March 2025 (FY25) and looks forward to the coming year.

Hippo Digital Limited, whilst part of a structure of other legal entities, is the only trading entity within the group.

Introduction

Modern slavery can encompass several forms of exploitation, including forced labour, human trafficking, servitude and forced marriage. Eradicating modern slavery is one of the targets in the United Nations' Sustainable Development Goals (Goal 8: Decent Work and Economic Growth). According to the Global Estimates of Modern Slavery, there were an estimated 27.6 million people living in forced labour in 2021 (of which 3.3 million were children).

Hippo is committed to preventing and mitigating modern slavery in both our organisation and our supply chain and supporting the wider effort to eradicate this unacceptable practice from society.

We recognise the importance of the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidelines on Responsible Business Conduct which requires businesses to:

- embed responsible business conduct into policies and management systems;
- identify and assess actual and potential adverse impacts associated with the enterprise's operations, products, or services;
- cease, prevent and mitigate adverse impacts;
- track implementation and results;
- communicate how impacts are addressed; and
- provide for and co-operate in remediation when appropriate.

Hippo was founded in 2016 and since becoming a large enterprise we have further increased our efforts to address the risks of modern slavery in our business. This statement provides an update on our activities in this area.

About Hippo and our Supply Chain

Hippo is a UK digital services consultancy providing services to both the public and private sector. We have around 450 employees, all of which are currently based in the UK, are over 18 and are paid at least the real living wage (or the National Minimum Wage if they are an apprentice). We do not currently employ or utilise an overseas workforce.

We additionally utilise associates (contractors) to supplement our employee workforce based on business needs. Associates (depending on their IR35 status) are either contracted via an umbrella company or a personal service company, sometimes via a recruitment agency. All associates must work in the UK and be over the age of 18 and are vetted in the same way as an employee.

Organisationally, the Chief Operating Officer is responsible for co-ordinating the business' response to modern slavery. The response provided here has been created with cross-functional business input from our five business functions (Commercial, Finance, Operations, Delivery and Services & Innovation). Each function is led by an Executive Director who has responsibility for risk management in their business function, including that of human rights and modern slavery.

Our key suppliers (identified currently as those with over £500k in annual spend) include digital services sub contractors or burst capacity partners, umbrella companies (for inside IR35 contractors) and recruitment agencies. We have minimal processes that we outsource (e.g. payroll, IR35 assessments, and BPSS checks).

In terms of our labour supply chain we recruit either directly (using direct applications or headhunting by our in-house recruitment team) or via the recruitment agencies on our preferred supplier list (PSL). We only use agencies outside of the PSL for niche internal roles. Any fees for hiring are agreed with, and paid directly to, the recruitment agency.

Organisational Policies

We have a Code of Conduct and have policies for modern slavery, supplier management, whistleblowing, social value (corporate social responsibility), anti-bribery and corruption, grievance and diversity inclusion and belonging policy.

In the coming year (2026) we are planning on revising our policies to ensure they cover all aspects of combating modern slavery and human trafficking. We have no practices in the business that conflict with these new policies but their inclusion will provide greater robustness and transparency. These will include supporting the freedom of workers to terminate employment, freedom of movement, prohibition of compulsory overtime and child labour as well as the prohibition of confiscating original identification documents.

Hippo is committed to creating and ensuring a non-discriminatory and respectful working environment for our staff, prohibiting any threat of violence, harassment and intimidation. This is covered by our Code of Conduct.

We want all of our staff to feel confident that they can expose wrongdoing either in the business or with a client, partner or supplier without any risk to themselves and we have a whistleblowing policy to allow staff to do that. In 2026 we will look to improve our whistleblowing process to further support the ease of anonymous reporting.

All our policies are reviewed annually. All new joiners are required to review and accept company policies as part of their onboarding. When policies are updated, these are communicated internally.

Assessing & Managing Risk

In FY25 we mapped our Tier 1 suppliers and asked our top 5 suppliers to complete a Modern Slavery Supply Chain Questionnaire. This was our first attempt at mapping our supply chain. This assessment has not identified any incidents of modern slavery in relation to these suppliers but we recognise that more work is needed to improve this assessment. Our Tier 1 supply chain will be further validated in the coming year (2026) as we roll out a new Purchase Order system which will allow us to better track all our suppliers.

We plan to expand our knowledge of our supply chain in 2026 by performing a risk assessment (using risk indicators) against each of our Tier 1 suppliers and asking all key suppliers (with whom we spend over £500k annually) or those that we believe are of higher risk of modern slavery (irrespective of spend, based on geographic, industry, product/service, and nature of work), to complete a revised Modern Slavery Supply Chain Questionnaire (which looks to obtain information on Tier 2 suppliers). We plan to identify an NGO partner to help us review our supply chain risk assessment.

We have this year created a Supplier Code of Conduct, which includes requirements around:

- Slavery, human trafficking and child labour;
- Human rights;
- Equal opportunities;
- Diversity, inclusion and belonging;
- Freedom of association and collective bargaining;
- Working environment; and
- Wages and remuneration.

This is to become part of our supplier onboarding process for new suppliers in 2026 and we will work towards introducing this to our existing supply chain.

Due Dilligence

We have considered the risks of modern slavery in our business as follows:

- Geographic (LOW) – we operate solely in the UK – there were 19,125 victims reported to the authorities in 2024¹ according to Anti-Slavery International with UK featuring in the bottom 15% of 160 countries according to Walk Free².
- Industry (LOW) – we operate in the digital services consultancy space – high risk industries include agriculture, mining, fishing, construction, manufacturing (especially textiles, electronics, and footwear), food processing, and logistics.
- Product and Services (HIGH) – our business model essentially provides services via people, and therefore this could be considered our biggest risk area.
- Nature of Work (LOW) – in consulting we only utilise skilled workers who have specialist skills in one of our sixteen professions. Unskilled workers are considered higher risk.
- Employment Method (LOW) – we recruit directly using our in-house team and via our preferred supplier list of recruitment agencies so believe we have good visibility of hiring practices.
- Mitigations & Oversight (LOW) – having grown from a SME, we still have good visibility at board level across the business as well as having a number of mitigations in place.

In order to help mitigate modern slavery in our business, in addition to our policies and training, we have the following in place:

- We do identification checks directly with the worker (employee/associate) requiring individuals to have personal access to their own identity documentation (not held by 3rd parties);
- For employees we perform bank checks to ensure that we are paying the individual and not a third party;
- When we recruit for our high volume consultant roles we use a small number of recruitment agencies on our preferred supplier list;
- Recruitment fees are paid directly to the recruitment agency;
- For associates that are contracted via an umbrella company, the contractor has the freedom of choice over which umbrella to use, provided the umbrella is registered with the FCSA;
- New service contracts are signed by an Executive Board member;
- All employees have a line manager and support networks to encourage trust and open communication.

1

<https://www.antislavery.org/slavery-today/slavery-uk/#:~:text=The%20real%20number%20of%20people,122%2C000%20people%20are%20in%20slavery.>

2

https://www.walkfree.org/global-slavery-index/map/?_gl=1*1pve5ru*_ga*MTC2MDgyNTkxMy4xNzQ5MDQ2OTc3*_ga_BLJ2LCP865*czE3NDkwNDY5NzYkbzEkZzAkDDE3NDkwNDY5NzYkajYwJGwwJGg5OTMOMzU1MTY.#mode=DATA:dimension=p

In 2026 we plan to provide information on how victims of modern slavery can access remedy, compensation, and justice.

We recognise that moving forward there needs to be additional emphasis placed on understanding our supply chain better, in particular ensuring that key suppliers, particularly in relation to any sub-contracted people services, are fully transparent in terms of their modern slavery risks.

Training

We introduced Modern Slavery training in 2023. Our CPD accredited online training module is designed to raise awareness of modern slavery and is mandatory for certain roles within the business, depending on their exposure to the supply chain. This training is completed and tracked on an annual basis.

Monitoring & Evaluation

For the coming year (2026), we are looking to introduce a formal set of KPIs to monitor and evaluate our Modern Slavery activities and effectiveness. It sets out our improvement priorities for the coming year.

As we make progress in this area, we will look to expand and introduce additional KPIs over time.

Goal	KPI	Frequency
Organisational Policies To review and improve company policies to encompass all aspects of modern slavery.	Policies to cover: - Freedom of workers to terminate employment, movement, association. - Prohibiting worker paid recruitment fees, compulsory overtime, child labour, confiscation of identity documents. - Access to remedy, compensation and justice for victims.	Review annually
Assessing & Managing Risk To increase understanding of the	% of Tier 1 supply chain mapped.	Review annually

Goal	KPI	Frequency
risks of modern slavery within the Hippo supply chain.	% of Key Supplier Tier 2 supply chain mapped.	
Assessing & Managing Risk To measure worker satisfaction with Hippo remediation.	% of works satisfied with Hippo remediation.	Review annually
Assessing & Managing Risk To complete an external audit of our supply chain risk assessment.	NGO (or similar) to have reviewed our supply chain risk assessment approach and outcomes.	One time
Due Dilligence To ensure no workers are paying recruitment fees (resulting in debt bondage) in tier 1 supply chains.	Contract review/update of recruitment agency and umbrella terms and conditions.	One time
Due Dilligence To improve anonymous grievance mechanisms for workers.	Provide a mechanism for workers to anonymously report suspected cases of modern slavery in the Hippo supply chain.	One time
Due Dilligence To improve visibility of potential modern slavery issues in the supply chain.	# issues identified via audits with key suppliers and the % of issues addressed.	Review annually
Training To increase awareness of anti-slavery, company policy and processes across the organisation.	% of key staff who have completed modern slavery training (in year). % of staff feedback (via an anonymised survey) that state they are confident on how to respond to a suspected incident of modern slavery in the organisation.	Review annually
Monitoring & Evaluation To ensure the Investor Board is updated on modern slavery progress including KPIs.	Present KPIs and modern slavery update at Investor Board.	6 monthly

This statement has been approved by Hippo's board of directors and is signed by Adam Lewis, CEO on 3rd July 2025.