

Hippo Digital Limited

Modern Slavery Statement

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Issued By:

Hippo Digital Limited

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Modern Slavery Statement Financial Year 2026

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 Hippo has taken during the financial year ending 31 March 2026 to prevent, identify and mitigate the risk of modern slavery and human trafficking in its business operations and supply chain.

This statement is reviewed annually following Hippo's financial year end on 31 March. It covers the financial year ending 31 March 2026 ("FY26"), including the steps taken during that year to prevent, identify and mitigate modern slavery risks in our business operations and supply chain. It also sets out our planned areas of focus for the following financial year ending 31 March 2027 ("FY27").

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 addressed in the United Nations Sustainable Development Goals, specifically Target 8.7 under Goal 8: Decent Work and Economic Growth. According to the latest ILO Global Estimates of Modern Slavery, an estimated 27.6 million people were living in forced labour in 2021, including 3.3 million 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 Guidance for Responsible Business Conduct. These internationally recognised frameworks set out expectations for businesses to respect human rights and carry out risk-based due diligence across their operations, supply chains and business relationships.

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. Over time we will look to continuously improve our Modern Slavery efforts in line with the OECD due diligence guidance for responsible business conduct, and our statement in line with Transparency in Supply Chains (TISC) guidance. This statement provides an update on our activities for FY26.

We first completed the UK government's Modern Slavery Assessment Tool (MSAT) in FY25. In FY26 we increased our score within the MSAT by 22% across the areas of Governance, Policies and Procedures, Risk Assessment and Management, Due Diligence and KPIs. Due Diligence remains as a focus area for future improvement particularly around supply chain management. We also annually complete the Modern Slavery Statement Registry.



About Hippo and our Supply Chain

Hippo Digital is a growing UK-based digital consultancy providing technology, data, and design services to both public and private sector organizations. Core disciplines span digital strategy, user-centered design, agile software engineering, and data management, including artificial intelligence implementation, identity management and cybersecurity.

Revenue information is available via [Companies House](#). We had c.665 staff at the end of FY26, 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 any overseas workforce.

We 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 (see Due Diligence section).

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. We plan to further revise our PSL and agency terms in FY27 to help safeguard against modern slavery risks in recruitment.

Across the business we have identified c.190 regular suppliers. These provide a range of services and software to Hippo as part of our operations. These range in size and scale and incorporate both local suppliers as well as multinational enterprises such as Google.

Organisationally, the Chief Operating Officer is responsible for co-ordinating the business' response to modern slavery including the Statement and KPIs. 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.



Organisational Policies

We maintain policies and procedures designed to support ethical business practices and reduce the risk of modern slavery. These have been enhanced in FY26 to encompass the following:

- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibiting any threat of violence, harassment and intimidation (including an overall Code of Conduct)
- Prohibiting the use of worker-paid recruitment fees
- Prohibiting compulsory overtime
- Prohibiting child labour
- Prohibiting discrimination
- Prohibiting the confiscation of workers' original identification documents

We have the following policies in place:

- Employee Code of Conduct (covers expectations regarding staff behaviours)
- Diversity Inclusion and Belonging (applies to all areas of employment including recruitment, development, progression and project opportunities)
- Health, Safety and Wellbeing (covering physical safety and psychosocial wellbeing)
- Human Rights (overarching policy to protect human rights)
- Modern Slavery (commitment to eradicating modern slavery within our operations and supply chains and expectations of employees, associates, sub-contractors, third-party representatives and business partners)
- Whistleblowing (to allow public interest concerns to be raised in good faith around malpractice or impropriety without fear of reprisal)
- Safeguarding (for young people and vulnerable adults)
- Supplier Management and Supplier Code of Conduct

All our policies are reviewed annually or in line with legislative changes to ensure they remain appropriate and effective in supporting our approach to combating modern slavery and human trafficking. They are reviewed collaboratively by both the internal People and Operations team and were also included in FY26 in an external review by the Slave Free Alliance. A series of recommendations have been made by the Slave Free Alliance and we will look to make improvements as appropriate to these in the coming 12 months.

All new joiners (employees and associates) are required to review and accept company policies as part of their onboarding. When policies are materially updated, these are communicated internally. Subcontractor requirements are flowed down through contractual agreements as well as our Supplier Code of Conduct (which has not yet been fully rolled out).

Our internal policies, processes and procedures form part of our integrated management system which is independently audited on an annual basis as part of ISO accreditations including 45001 and 45003 which relate to Health and Safety and Psychological Health.



We look to provide access to remedy, compensation, and justice for victims of modern slavery but we recognise this is an area that could be improved by providing a clear remediation framework for human rights incidents.

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 FY26 we introduced the opportunity to report whistleblowing (including anonymously) via our [website](#). There were no incidents of modern slavery reported via this mechanism in FY26.



Assessing & Managing Risk

To date, we have considered the risks of modern slavery in our direct business using a number of lenses, but recognise that these may also intersect. In future, we hope to evolve this through a Human Rights Saliency Assessment, working with the Slave Free Alliance.

Geographic (Low)

- We operate solely in the UK, which presents a lower geographic risk than many high-prevalence countries. However, modern slavery remains a material risk in the UK. From January to September 2025,^[1] **17,401 potential victims** were referred through the National Referral Mechanism. The Home Office recorded **23,411** referrals of potential victims in 2025, and Walk Free^[2] estimates that **122,000 people** were living in modern slavery in the UK in 2021, with the UK ranked **145th out of 160 countries** for prevalence. Therefore, while the UK only geographic footprint supports a lower geographic risk rating, controls remain necessary across recruitment, suppliers, subcontractors and labour practices.

Industry (Low)

- We operate in the digital services consultancy sector, which is not generally considered one of the highest-risk modern slavery sectors. Higher-risk sectors typically include agriculture, mining, fishing, construction, manufacturing, food processing, textiles, electronics, footwear and logistics.

Product and Services (Medium)

- Our services are delivered by people, so workforce-related controls are essential. We therefore consider this a high inherent risk area, reduced through direct employment, recruitment and supplier controls/oversight (to medium)

Nature of Work (Low)

- Our consultancy work is delivered by skilled professionals across digital, data, design, engineering, delivery and related disciplines. Our services are primarily delivered by skilled digital professionals rather than low-paid, manual or informal labour who may be more at risk of modern slavery.

Employment Method (Low)

- We recruit primarily through our in-house team and through a preferred supplier list of recruitment agencies. This gives us good visibility over hiring practices. Some residual risk remains where contractors, umbrella companies, recruitment agencies or third-party delivery partners are used.

Mitigations & Oversight (Low)

- We have board level visibility across the business and maintain controls designed to mitigate modern slavery risk, including supplier due diligence, recruitment controls, right to work checks, whistleblowing routes, relevant policies and annual review of our modern slavery approach.



Assessing our supply chain has not progressed as far as we would have liked during FY26. We believe the primary supply chain risks sit within IT hardware procurement (laptops, electronics involving conflict minerals), human capital (recruitment agencies, umbrella companies, IT contractors), and facilities management (cleaning and catering). During FY26 Hippo became a member of the Slave Free Alliance (which is owned by the charity Hope for Justice). Our Operations team plans to work in collaboration with the Slave Free Alliance on a Human Rights Saliency Assessment to produce a UNGP-aligned risk matrix identifying and prioritising high risk suppliers and categories.

We have established a Supplier Code of Conduct and Supplier Questionnaire but these have not been fully rolled out. Many of our larger suppliers will only engage on their standard terms. Hippo's Supplier Code of Conduct, 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
- Wages and remuneration



Due Diligence

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

- Identification checks directly with the worker (employee/associate) requiring individuals to have personal access to their own identity documentation (not held by 3rd parties)
- Bank checks for employees to ensure that we are paying the individual and not a third party
- When recruiting for our high volume consultant roles we use a small number of recruitment agencies on our preferred supplier list
- Paying recruitment fees directly to the recruitment agency
- Allowing direct Inside IR35 contracts the freedom of choice over which umbrella to use, provided the umbrella is registered with the FCSA and is SafeRec accredited
- Use of SafeRec for umbrella compliance auditing
- Review of modern slavery policies for companies supplying directly contracted cleaning services
- New service contracts requiring Executive Board member signature
- Provision of line managers for all employees and other support networks to encourage trust and open communication

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. From working with the Slave Free Alliance, this has also created a better understanding of the need to support suppliers in making improvements to their practices rather than jettisoning suppliers if they identify a modern slavery issue.



Training

We introduced Modern Slavery training in 2023. Our externally provided (Kallidus) CPD accredited online training module is designed to raise awareness of modern slavery. It provides an introduction to modern slavery (including Modern Slavery Act 2015), the scale of the issue, what it encompasses, how to identify the signs, how to report suspicions, what not to do and a short test at the end.

The course is mandatory for certain roles within the business, depending on their exposure to the supply chain. This includes leadership, people team, legal and commercial. This training is completed and tracked on an annual basis. In FY26 this was completed by all required staff (45 employees with an average score of >90%). We plan to expand the scope of the training to include additional internal roles in FY27.

The training is also freely available to all employees via our learning hub.



Monitoring & Evaluation

Throughout this report we have identified what actions Hippo has taken during the current financial year. At the start of FY26 we introduced a set of KPIs to help demonstrate year-on-year progress in identifying, preventing and responding to modern slavery. These have been updated with progress at the end of FY26 and in some cases redefined. As we continue to progress in this area, we may expand and revise these KPIs further.

TISC Alignment & Purpose	KPI	Target / Timeframe	Result/ Commentary
Organisational Policies To review and improve company policies to encompass all aspects of modern slavery and align with leading practice	Review (and where required, update) responsible business conduct policies to align with key principles (e.g. UN Guiding Principles, OECD)	100% reviewed / Annually	Policy review completed by Slave Free Alliance in FY26 – improvements to be made in FY27
Organisational Policies To improve anonymous reporting of suspected modern slavery in the Hippo supply chain	Provide a mechanism for workers to anonymously report suspected cases of modern slavery in the Hippo supply chain	Mechanism delivered / FY26	Anonymous whistleblower reporting now supported via the Hippo website
Assessing and managing risk Leverage expertise of third parties in support of improvements	Engage with an NGO to provide additional expertise in support of Hippo's modern slavery improvements	NGO engaged / FY26	FY26 – Hippo become a member of the Slave Free Alliance Membership Programme
Assessing and managing risk To assess supplier saliency and identify risks in the supply chain	Complete a Human Rights Saliency Assessment	Assessment Completed / FY27	Revised KPI for FY27 – original KPI related to Supply Chain mapping which has now been revised following input from SFA. Further KPIs to be developed following this activity



TISC Alignment & Purpose	KPI	Target / Timeframe	Result/ Commentary
Due diligence To ensure workers are not paying recruitment fees (resulting in debt bondage) in tier 1 supply chains	% of recruitment agencies on PSL that have signed Hippo Supplier Code of Conduct and provided their modern slavery policies	100% / Annually	To be implemented in FY27 followed in future by due diligence checks
Training To increase awareness of modern slavery, identification and reporting	% of targeted staff who have completed modern slavery training	>95% / Annually	FY26 – 100%
	% of targeted staff (via an anonymised survey) who state they are confident in how to respond to a suspected modern slavery concern	>90% / Annually	FY26 – 100% (of survey responses received)
Monitoring and Evaluation To increase worker satisfaction with remediation	Where remediation is required, % of affected workers who confirm the remediation process was accessible, fair and effective	>75% / Annually	FY26 – no instances identified
Monitoring and Evaluation Assess progress using the Modern Slavery Assessment Tool	Demonstrative improvement via completion of the Modern Slavery Assessment Tool (MSAT)	% increase / Annually	FY26 – score of 69% (increase of 22%)
Monitoring and Evaluation To report on modern slavery progress at Investor Board level	Modern Slavery tabled and progress reviewed at Investor Board	Tabled / 6 monthly	FY26 – completed every 12 months

This statement has been approved by the Board of Directors and is signed by Adam Lewis, CEO on 22nd July 2026.

This statement is reviewed on an annual basis following the financial year end and the next statement is due to be published by 30 September 2027.

[1]

<https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2025/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2025>

[2] <https://www.walkfree.org/global-slavery-index/country-studies/united-kingdom/>

