



Modern Slavery Statement for the year ended 31 December 2025

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 2025 and ending 31 December 2025 for the entities listed in this statement (the "Hiscox Companies"). Our previous statement can be accessed here - <https://www.hiscoxgroup.com/modern-slavery-act>. In addition, this statement also considers alignment to the Home Office statutory guidance relating to Transparency in Supply Chains and United Nations Guiding Principles.

Our Commitment

Hiscox is committed to operating with integrity, transparency and accountability, and to preventing modern slavery and human trafficking within our business and supply chain. We uphold high ethical standards, guided by our values and our responsibility to stakeholders, including employees, customers, suppliers, investors and the communities in which we operate. We comply with all applicable laws and expect the same of our business partners. In 2025, we strengthened our approach through stakeholder workshops, a third party-supported gap analysis, and a Modern Slavery and Human Rights Risk Review. Actions identified are being progressed to enhance controls in 2026.

"Hiscox is dedicated to maintaining the highest standards of integrity and human rights throughout our operations and supply chain. We take a risk-based approach to assess the risks of modern slavery within our business and among our partners, and we are committed to collaborating with our stakeholders to eliminate it. Combating modern slavery requires a collective effort, and we are committed to doing our part." – **Aki Hussain, Group Chief Executive Officer**

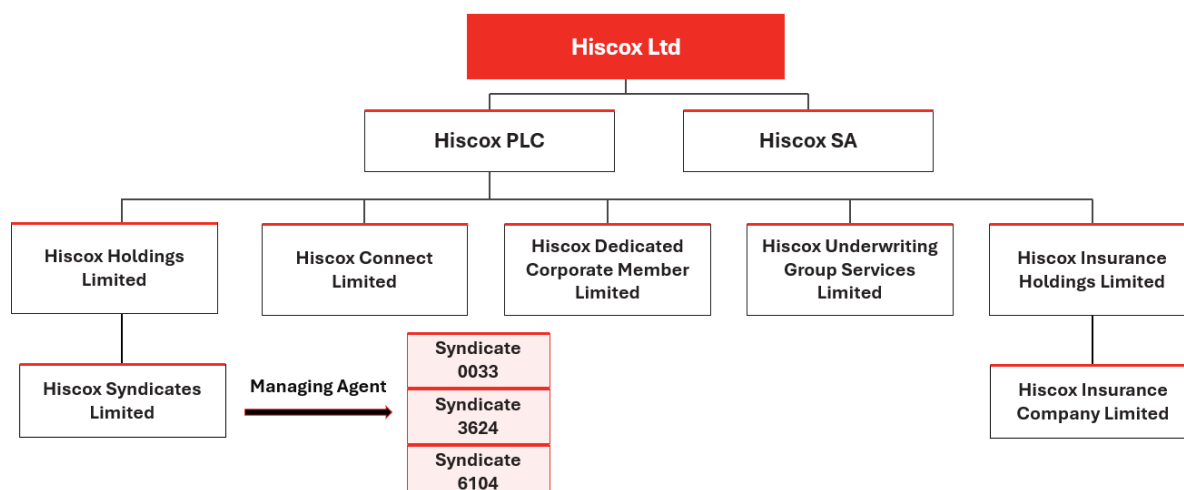
Our Structure

The Hiscox Group employs over 3,000 people with a global customer base. We are headquartered in Bermuda and have offices across 13 countries including: Belgium, Bermuda, France, Germany, Guernsey, Ireland, Luxembourg, Netherlands, Portugal, Italy, Spain, United Kingdom and the USA.

Through our insurance businesses in the UK, Europe 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.

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

- Hiscox Dedicated Corporate Member Limited
- Hiscox Underwriting Group Services Limited
- Hiscox Syndicates Limited
- Hiscox Insurance Company Limited
- Hiscox Insurance Holdings Company Limited
- Hiscox Holdings Limited
- Hiscox PLC
- Hiscox SA



Our Policies

We maintain a robust policy framework aligned to international human rights standards, including the Universal Declaration of Human Rights and ILO core labour standards.

- Our Supplier Code of Conduct
- Grievance Policy & Procedures
- 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
- Responsible Investment 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 Boards 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 sustainability strategy which includes provisions to continue to identify and prevent modern slavery occurrences. Our Group CEO signs off on this strategy whilst the responsibility for its development sits with our Group General Counsel and our Global Head of Sustainability.

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. Hiscox's exposure to modern slavery risk is considered low overall, given that we primarily operate in countries with low inherent risk; however, there is some exposure through higher-risk industries, particularly sectors such as construction, transportation, and certain supply chain activities. To mitigate this, we have strengthened our

governance and oversight through annual updates to relevant policies, ongoing supply chain risk management enhancements, and external benchmarking and gap analysis exercises. Actions are in place to improve transparency and compliance, with identified gaps addressed and further improvements incorporated into business-as-usual activity.

Due diligence

Modern Slavery is applicable to Hiscox due to the inherent risk associated with the activity we conduct and in our commercial relationships, including; the lines of business we write via our Underwriting functions, Investments / Asset portfolios, third party contracts we procure and the responsibility for the wellbeing of our own workforce. Further details can be found in the following sections of this statement.

Supply Chain

We apply a structured, risk-based approach to supplier due diligence and do not support or engage suppliers where we are aware of modern slavery or human trafficking. To understand this, we carry out the following due diligence:

- Use of the FSQS platform (via Hellios) to assess supplier risk, including modern slavery exposure.
- Use of EcoVadis, a global ESG platform, for ESG assessments at tender stage for higher-risk and spend suppliers.
- Regular monitoring and review of supplier performance.

Suppliers found to present risks are subject to enhanced review and remediation processes.

Investments

We integrate human rights considerations into investment decision-making through;

- Due diligence includes an established Group Investment Dashboard (data gathered from MSCI and Bloomberg) which includes multiple elements of ESG, including data relating to Human Rights across portfolios within the Group and at Legal Entity level.
- The Investment Manager guidelines document has a clause to exclude any investments which are in breach of Human Rights standards. Hiscox's Responsible Investment Policy has a requirement relating to the "disclosure of significant sustainability-related issues in the portfolio to Hiscox, such as companies' policies and respect for human rights".
- In the semi-annual ESG meetings with each of the investment managers, they provide an update on any process developments or new data sources they are using to better understand and/or manage ESG issues, including with respect to human rights topics. In addition to ESG and human rights-related data, the investment managers use a range of fundamental analysis techniques, including the use of credit ratings, to assess the attractiveness of a particular investment.

Underwriting

In our London Market portfolio, we use an external data provider to assess the ESG credentials of the companies we underwrite. The 'S' metrics include a focus on Human Rights, Labour Rights and Modern Slavery. Hiscox has increased the level of data coverage within the London Market portfolio and will continue to consider expansion to other portfolios in the future when data sources improve. Claims contractors are required to go through due diligence, which includes questions that pertain to modern slavery.

Whistleblowing

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 is supported by a procedures document. The policy applies to both our employees, suppliers and agency workers. The policy is updated annually.

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 employees complete mandatory training, including content on raising concerns. Targeted modern slavery training was delivered in 2025 to key risk areas, including procurement, underwriting and investment teams, and will continue annually. Members of the Procurement team received additional training on ESG risk assessment tools, including EcoVadis, while members of the Investment team continuously improve their skills in ESG related matters.

Monitoring and effectiveness

In 2025:

- No breaches of the Supplier Code of Conduct were reported.
- No cases of modern slavery were identified through whistleblowing channels.

We continue to monitor and enhance KPIs to assess performance and identify areas for improvement.

We are committed to transparent reporting of our progress in addressing modern slavery risk. We continue to monitor and enhance our KPIs, which will help us ensure compliance with our standards across our value chain and identify any areas that need further work.

Relevant metrics monitored are noted in the table below;

Key Performance Indicator	Data	Context
Number of current suppliers onboarded on EcoVadis	263 suppliers (Prior year: 242 suppliers)	Suppliers already on EcoVadis (global ESG platform) or falling into a high risk and spend category are required to complete an EcoVadis assessment.
Number of current suppliers with a low (<45) Labour and Human Rights score	8 suppliers (Prior year: 12 suppliers)	Suppliers who have completed an EcoVadis assessment and who have received a low (<45) Labour and Human Rights rating score. Suppliers found to present increased risk are subject to enhanced review and remediation processes.
Number of supplier risk acceptances	0 suppliers (Prior year: N/A)	Suppliers can be accepted noting some minimal risk at the discretion of Executive Management, the KPI monitors any acceptance throughout the year.

Completion of targeted annual training	Targeted training was assigned to 42 employees, which had a completion rate of 90% (Prior year: N/A)	Targeted training in 2025 was delivered to employees and leaders operating in key risk areas within the business. Other ESG risk assessment training modules were also undertaken by our Procurement function during 2025.
Number of cases reported through Whistleblowing channel	0 reports (Prior year: 0 reports)	In 2025 there were no suspected cases of Modern Slavery reported through the Whistleblowing channel.
Investment portfolio alignment to UNGC	73% (Prior year: 71%)	As at Q1 2026, 73% of our investment portfolio was aligned to the UNGC.

In 2024 we shared the following 2025 actions, the table below shows our progress against them;

2025 action	Progress update
Pilot an alternative data source that will provide enhanced modern slavery and human rights information on our larger policyholders.	Pilot of a new data source was a success, and new data has been received, the quality of this data is improving, and the focus is now on analysing and embedding the data source into our systems.
Consider improving the frequency of updates to the Investment dashboard to enable more up to date information to aid decision making.	Attempts to increase the frequency of the Investment dashboard did not lead to improvements in data quality; as a result, management decided to retain the current quarterly reporting frequency.
Embed improved targeted training and awareness to senior leadership and also impacted teams to instil roles and responsibilities and to drive the right behaviour.	Training was rolled out in 2025 to senior leadership and impacted teams, reinforcing clear roles and responsibilities and promoting the expected behaviours across the organisation.
Define roles and responsibilities within the Hiscox Board and document the overall responsibility for Human Rights and Modern Slavery within Hiscox.	Review of roles and responsibilities has commenced and will progress during 2026.
Introduce, implement and embed mechanisms to track progress against actions set to prevent Human Rights and Modern Slavery activities, including internal Hiscox actions as well as any external supplier areas of improvements / actions.	KPIs have been introduced which are monitored on a periodic basis.
Address any gaps with regards to contracts, supplier due diligence and processes aligned with our supplier management platform to enhance the due diligence of Modern Slavery within our supply chain.	As of Q1 2026, 92% of applicable commercial suppliers have contractual terms in place. Further work is underway to address the remaining gaps.
Improve existing processes to monitor the regulatory landscape, including a feedback loop to impacted functions / key stakeholders. This should include broader topics such as Human Rights and Modern Slavery	Processes to monitor the regulatory landscape continue to improve, over the last year we have introduced monthly check-ins with key stakeholders, setting up a regulatory change working group and have begun to investigate how AI can support this process going forwards. Modern Slavery and Human Rights risks are captured through data providers embedded within relevant teams, looking forward there are ongoing improvements to ensure feedback loops are connected.

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.

In 2025 our Group Sustainability Manager and a Risk Officer were invited to discuss Human Rights and Modern Slavery at a dedicated external conference. Key areas of the discussion included Hiscox's development and progress in this area, the challenges faced by the insurance industry and how Hiscox is looking to address any gaps identified. The discussion amongst other insurers and corporations was well received and praised for the opportunity to share challenges and work together to mitigate risks. Stakeholder engagement and industry collaboration is something that we prioritise and will continue to look for opportunities to do so going forward.

We will continue to 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:

- Develop the analysis of our data sources in order to enhance modern slavery and human rights information on our larger policyholders.
- Continue the review of roles and responsibilities within the Hiscox Board and document the overall responsibility for Human Rights and Modern Slavery within Hiscox.
- Continue to develop feedback loops from newly sourced and existing data providers into relevant teams.

Hiscox will publish a statement relating to the previous financial year annually on the Hiscox Group website, www.hiscoxgroup.com.

This statement has been approved by the Hiscox Ltd Board of Directors on 26 June 2026 and signed on its behalf by:

Aki Hussain
Hiscox Group Chief Executive Officer



26 June 2026

Publication date: 26 June 2026