

## Modern Slavery Act Statement

**DIFFICULT.  
DONE WELL.**

A decorative teal wavy line that starts from the bottom left and curves upwards and to the right, ending near the top right corner of the page.

# Contents

---

<b>Modern Slavery Act 2015</b>	<b>3</b>
<b>Introduction</b>	<b>3</b>
<b>Our Business Organisation, Structure and Supply Chains</b>	<b>3</b>
<b>Our Policy and Approach</b>	<b>3</b>
<b>Due Diligence</b>	<b>4</b>
<b>Risk Assessment and Management</b>	<b>4</b>
<b>Our Training and Effectiveness</b>	<b>5</b>
<b>Looking Ahead</b>	<b>5</b>
<b>Review</b>	<b>5</b>

---

# Modern Slavery Act 2015

---

The UK Modern Slavery Act 2015 (the “Act”) seeks to address the role of businesses in preventing modern slavery occurring in their organisations and supply chains. It applies to businesses of a certain size, which are required to publish a statement setting out the steps they have taken to ensure that modern slavery and human trafficking are not taking place in their business or supply chains.

## Introduction

---

This Slavery and Human Trafficking Statement (“Statement”) is made on behalf of Specialist Risk Investments Limited (“SRG”) and its UK and Ireland subsidiaries pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (the “Act”), for the financial year ending 31 December 2025.

It sets out the steps that SRG has taken, and is continuing to take, to ensure that modern slavery and human trafficking are not taking place within any part of our business, or in any of our supply chains.

## Our Business Organisation, Structure and Supply Chains

---

SRG and its subsidiaries (the “Group”) provide insurance brokerage and risk management services, to both domestic and international entities, on a direct and wholesale basis. Its brokers, agents and administrators act as intermediaries between insurers and their customers.

SRG is headquartered in the UK, and it is a separate legal entity distinct from its subsidiaries. It has subsidiaries, both regulated and non-regulated predominantly in the UK and Ireland, which expanded to include subsidiaries in Singapore, Belgium and the Netherlands in 2025. The majority of the Group’s revenue is generated in the UK and Ireland. As the Singapore, Belgium and Netherlands subsidiaries are independent businesses, many operating under local broker licences and do not have a demonstrable business presence in the United Kingdom, this Statement applies to SRG and its UK and Ireland subsidiaries only.

As a responsible insurance brokerage, SRG seeks to work with reputable providers and manufacturers of insurance products who comply with the Act. SRG also retains certain outsourced service providers for the maintenance and support of its operations including office and IT infrastructure and related services.

## Our Policy and Approach

---

We operate in line with fundamental human rights and do not tolerate forced or compulsory labour. Holding someone in slavery or servitude is a criminal offence and SRG has zero tolerance for any form of slavery and human trafficking.

We strongly believe in the rule of law, and we are committed to complying with all laws, regulations and rules relevant to our business, and take our corporate and social responsibilities very seriously. We expect the same high standards from those we conduct business with.

SRG monitors compliance with its internal Group policies and procedures to ensure that we are conducting business in an ethical and transparent manner. We identify and mitigate risk across a range of areas, including slavery and human trafficking, by integrating these policies and procedures in our decision-making process.

The following policies underpin our efforts to ensure that we are addressing the risk of modern slavery across the business. The adherence to our policies and standards is monitored by our Risk and Compliance team.

- Whistleblowing Policy
- Financial Crime Policy
- Third Party Oversight Policy
- Data Protection Policy

## Due Diligence

---

In accordance with SRG's policy, due diligence is conducted at two main levels:

As part of the pre-employment and recruitment process for our staff, we ensure that all candidates are legally permitted to work within the relevant jurisdiction, that they are joining of their own free will and are not coerced to join us. Our regulated firms also undertake background and financial checks for all staff, in line with regulatory requirements.

In our commitment to continuous improvements we have strengthened our people management approach through the planned roll out of a new Human Resources system, HiBob. This will strengthen first line controls in our onboarding processes, enhanced record keeping, clearer oversight of pre-employment checks, and automated reminders relating to colleagues' right to work documentation.

Our procurement processes include due diligence on a risk-based approach prior to contracting with any new supplier to in ensuring all stakeholders that we work with have been vetted to provide assurance that there is no immediate risk exposure to our business.

In addition, our employees perform low modern slavery-risk roles which are essentially office-based positions and include roles that require specialist qualifications such as HR, Finance, Insurance intermediation etc. We believe the greatest risk lies within our supply chain. Therefore, we aim to assess our modern slavery risks across the business annually through our procurement due diligence process.

## Risk Assessment and Management

---

We are steadfast in our commitment to eradicating slavery and human trafficking within our operations and supply chains. To help assess and vet our suppliers to mitigate any modern slavery risks we follow a robust process for our supplier onboarding and expect all our suppliers to comply with our Supplier Code of Conduct.

- Supplier onboarding is managed through a structured workflow, ensuring all requests are logged, tracked, and auditable end-to-end. All suppliers are required to comply with our Supplier Code of Conduct as a condition of onboarding. We conduct ongoing revalidation of our existing supplier base to ensure that standards are maintained throughout the supply chain, not only at the point of initial engagement.
- We foster a culture of openness and transparency, encouraging all stakeholders to raise concerns without fear of reprisal. We provide accessible reporting channels that support confidential reporting, ensuring colleagues feel safe and supported when speaking up. All concerns raised are addressed promptly and fairly, and where appropriate are escalated and reported to the relevant management committee. To further strengthen this approach, we have deployed a new whistleblowing platform, which improves accessibility and confidentiality and supports colleagues to speak out freely and with confidence.

## Our Training and Effectiveness

---

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training for all our staff. We raise awareness of conduct, human rights and, inclusion and diversity amongst our staff through annual mandatory training via an e-learning portal. We encourage staff to report all potential or actual incidents that relate to wrongdoing, actual or suspected illegal or serious inappropriate activity, whether related to modern slavery or not. A confidential, externally facilitated portal is provided for staff to report their concerns confidentially.

## Looking Ahead

---

We measure progress by monitoring key indicators, including supplier risk profiles, engagement with reporting mechanisms, and the results of our audits, to ensure we are moving forward in line with our values.

- We regularly review and enhance policies and guidelines across the business.
- Ongoing monitoring and assessment of supply chain partners, particularly in areas of elevated risk.
- We continue to build manager awareness and accountability around compliant hiring practices, to ensure a consistent and robust approach across the business.
- Additional checks to ensure an enhanced due diligence of our suppliers are introduced where appropriate, ensuring that standards are upheld throughout our supply chain.
- We provide regular training and awareness to empower our teams to identify and address potential issues.
- Our new whistleblowing facility is available to internal and external parties allowing for third parties to raise any modern slavery concerns.

## Review

---

We will continue to review and update our compliance and risk management approach as our businesses and inherent or perceived supplier risks change over time.

During the year ended 31 December 2025 there were no incidents relating to modern slavery or violations of human rights identified and no incidents were reported by staff or relating to our supply chain or suppliers themselves.

This Statement is made pursuant to section 54(1) of the Act and constitutes SRG's and the relevant entities' modern slavery and human trafficking statement for the financial year ending 31 of December 2025.

This Statement is approved by Specialist Risk Investments Limited's Board of Directors on 3 July 2026.