

Anti-slavery and human trafficking statement

This Anti-Slavery and Human Trafficking Statement (the “**Statement**”) is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Fidelis Group’s slavery and human trafficking statement for the financial year ending 31 December 2022. This statement has been approved by the Board of Directors of Fidelis Insurance Holdings Limited on 15 May 2023.

ORGANISATION’S STRUCTURE

Fidelis Insurance Holdings Limited is the holding company of the Fidelis Group which provides insurance and reinsurance services on a global basis. The companies within the Fidelis Group are either regulated insurance and/or reinsurance companies or service companies or serve a purpose ancillary to its principal insurance and/or reinsurance activities. Fidelis Insurance Holdings Limited has its registered office in Bermuda. There are 260 employees across the Fidelis Group which operates in Bermuda, Republic of Ireland and the UK as at 31 December 2022.

This statement covers activities of the following Fidelis entities:

- Fidelis Insurance Holdings Limited
- Fidelis Underwriting Limited
- Fidelis Insurance Bermuda Limited
- Fidelis European Holdings Limited
- Fidelis Insurance Ireland DAC
- Fidelis Marketing Limited*

OUR COMMITMENT

The Fidelis Group has zero tolerance to slavery and human trafficking and is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

This Statement contains the Fidelis Group’s vision and commitment to be a responsible organisation in the insurance industry to combat slavery and human trafficking. We have devised a robust operational procedure to ensure that our values and ethics are integrated into our operations and to prevent slavery and human trafficking. We provide more detail on these steps below.

ANTI-SLAVERY CHARTER

In 2018, Fidelis was the first financial services company to sign up to the Anti-Slavery Charter.

The Anti-Slavery Charter sets out basic measures that states, NGOs, businesses and societies must take to end slavery across the globe. As a business committed to preventing slavery and human trafficking, Fidelis pledges to using its power to empower those vulnerable to slavery, to advance emancipation, and to promote access to decent work.

As part of our commitment to the Anti-Slavery Charter, the Fidelis Group has established a robust due diligence process to ensure that the recruitment agencies we work with are adhering to the basic standards of human rights protections.

Details of the Anti-Slavery Charter can be found here:

<https://www.antislavery.org/anti-slavery-charter/>

We have received confirmation from Anti-Slavery International that there has been no change to the Anti-Slavery Charter in 2022.

TRAINING

To ensure an understanding of the risks of modern slavery and human trafficking in supply chains, we conduct compulsory compliance training for all staff annually. For the 2022 modern slavery training session, again we have extended the training invitation to all the managing general agents within our Pine Walk incubator platform, sharing our commitments to the cause, the checks and processes we have in place to mitigate the risk of inadvertently supporting slavery or human trafficking, and the actions we have taken to combat slavery and human trafficking in the insurance industry.

All staff have also been provided with a copy of this statement and the training materials to raise awareness.

OUR SUPPLY CHAINS & MITIGATING ACTIONS TAKEN TO ASSESS AND MANAGE THE RISK OF SLAVERY AND HUMAN TRAFFICKING

The Fidelis Group is a provider of insurance and reinsurance services and the Fidelis Group engages with brokers on a global basis. The Boards of the Fidelis Group companies consider that the risk of it or its supply chains being involved in or complicit in slavery or human trafficking is very low due to the nature of the services. The Fidelis Group is not involved in the activities of producing or manufacturing goods which typically involve supply chains which can be susceptible to this risk. There is a risk, however, that whilst not being within its supply chains in the everyday sense, insurers can become involved and thereby complicit, by virtue of their insurance of supply chains or development projects, which could involve slavery or human trafficking.

As such, since 2018 the Fidelis Group has been driving an initiative, in cooperation with a number of London market brokers and underwriters, to produce a model clause in marine cargo insurance contracts to mitigate the risk of inadvertently supporting slavery or human trafficking in the insured supply chains. In 2019, the Fidelis Group continued its work trying to mitigate this risk by exploring practical solutions with major brokers and legal advisers to ensure that the model clause would be effective and have a wide application to marine cargo policies regardless of where the insured or the risks are located. In June 2020, Fidelis, Aon and Marsh agreed that the model clause should operate as a reminder to the insureds of their legal duties in respect of forced or child labour. Specifically, the model clause states:

“It is hereby understood and agreed that the Insured shall exercise best efforts to be compliant with all applicable legal and regulatory obligations that the Insured should be aware of in their country of domicile, relating to the cargo insured, in respect of forced and/or child labour.”

Following the agreement to the wording of the clause, Fidelis is continuing to require the model clause to be included in all the new and renewing marine cargo business.

The International Underwriting Association (IUA), Lloyd's Market Association (LMA), London & International Insurance Brokers Association (LIIBA) have all expressed their support to the use of the model clause.

In 2023, Fidelis remains committed to this initiative and continues to promote the use of the model clause in marine cargo contracts, with the model clause included in all quotes provided by Fidelis to prompt the conversation and ensure appropriate due diligence is undertaken on prospective clients and their businesses. In addition, Fidelis continues to participate in the wider conversation, including through its work with Anti-Slavery International (ASI) and the Independent Anti-Slavery Commissioner's office.

The Fidelis Group also mitigates the risk of insuring development or construction projects which could involve slavery or human trafficking by its standard underwriting process which requires its underwriters to be satisfied that the highest social and environmental standards are upheld before it underwrites such risk. If the underwriter is not satisfied that these standards are met, Fidelis will not underwrite the risk.

The Fidelis Group procures services in areas including catering, cleaning, office maintenance, IT support, IT software development, investment management, claims handling and actuarial consultancy. We have taken steps to confirm with the property managers for both of our UK premises, from whom we procure cleaning and other building services, their procedures for mitigating the risk of slavery and human trafficking in their supply chains, and are satisfied with their compliance. The managing company of our Bermuda premises has confirmed that while it is not subject to the Modern Slavery Act 2015, its policies reflect the same philosophy and standards in relation to its staff and the procurement of services. The managing company of our Dublin office has also confirmed its compliance and that it has adequate procedures in place to ensure that all of its third party suppliers comply with the applicable anti-slavery and human trafficking laws. We are satisfied that our investment managers share our philosophy of having a zero tolerance to modern slavery and human trafficking and are committed to mitigate the risk of modern slavery and human trafficking in their businesses and supply chain.

We have taken steps to include a clause in our material service contracts to ensure that compliance with anti-slavery and human trafficking law is embedded in our relationships, beginning with our actuarial consultancy and IT software development services contracts, to raise awareness and to oblige our service providers to ensure there is no slavery or human trafficking in their businesses or supply chains.

All employees continue to be contractually required to behave in a professional manner and not bring the company into disrepute; this is inclusive of the approach to engaging suppliers. Additionally, employees are required to uphold the Fidelis Group's ethos which acts as a set of guiding principles in how to conduct business activities.

DUE DILIGENCE PROECSS

The Fidelis Group recognises the role of due diligence in combating slavery and human trafficking. Prior to writing any cargo risks, entering into material services contracts, or engaging higher risk service providers, we conduct due diligence on counterparties assessing the potential risks of inadvertently supporting slavery or human trafficking within our business and supply chain.

Since 2019, we have embedded in our centralised IT procurement process a procedure to vet all IT service providers to ensure that not only are they compliant with the applicable modern slavery and human trafficking laws, but also taking positive actions to mitigate the associated risks in their business and supply chain. In 2023, we shall continue to assess the risks associated with our procured services and if appropriate, expand the scope of our assessment as our business continues to grow.

OUR POLICIES

This Statement is the principal articulation of the Fidelis Group's policy on slavery and human trafficking and is intended to inform and influence all the operational procedures within the Fidelis Group. In order to identify and mitigate potential risk areas, including risk of slavery and human trafficking in our supply chains, we operate a range of policies and procedures, including the following:

- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Outsourcing Procedure

Our Compliance function provides regular training on the above policies and procedures to all staff and new joiners. The Group Head of Compliance monitors compliance with these policies, which is reinforced by the Internal Audit function.

RECRUITMENT

Whilst reputable employment agencies are engaged to source candidates, the Fidelis Group's Human Resources function carry out checks to ensure that employees have the right to work and are protected by relevant employment legislation.

We also expect all our staff to enjoy the following basic rights:

- The right to a reasonable wage;
- The right to a safe working environment;
- The right to an appropriate level of holiday and cover for a period of sickness;
- The freedom to complain directly via our internal Grievance Procedure free of charge if they believe that they are not being treated fairly; and
- The freedom to report any other concerns via our Whistleblowing Policy free of charge, if they have any other concerns.

EFFECTIVENESS

By stating its clear policy in this Statement and by ensuring its staff's awareness of modern slavery as a result of the training described above, the Fidelis Group is able to effectively mitigate against the risk of slavery and human trafficking within the context of its limited supply chain. In addition to staff awareness when engaging suppliers, the adoption of the Fidelis Group's Anti-Slavery and Human Trafficking policy in its material service contracts is effective in placing a contractual obligation on Fidelis' counterparties. The roll out of the marine cargo clause in the London market has successfully raised awareness of modern slavery and human trafficking among brokers and the insureds. For 2023 Fidelis will continue its best efforts to advocate for the adoption of the clause to brokers and insurance associations.

Daniel Burrows, Group Chief Executive Officer

Date: 15 May 2023

*Fidelis Marketing Limited no longer formed part of the Fidelis Insurance Group since 3 January 2023

