

# 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 2023. This statement has been approved by the Board of Directors of Fidelis Insurance Holdings Limited on 4 November 2024.

## 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 were 77 employees across the Fidelis Group, which operates in Bermuda, Republic of Ireland and the UK, as at 31 December 2023.

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
- FIHL (UK) Services 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.

## 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.

Details of the Anti-Slavery Charter can be found

here:

[https://www.antislavery.org/anti-slavery\\_charter/](https://www.antislavery.org/anti-slavery_charter/)

## 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.

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, insurance intermediaries can become involved and thereby complicit, by virtue of their insurance of supply chains or development projects, which could involve modern slavery or human trafficking. The Fidelis Group, together with its major outsourcing partner The Fidelis Partnership, has championed the use of a contractual provision to address this issue for a number of years. The Fidelis Partnership is regarded as the leading advocate of this approach in the London market, having been the prime mover in authoring the wording now in use. In the business we underwrite with The Fidelis Partnership we have continued including the following forced labour clause (the "Clause") in all the marine cargo business as our default policy wording and 72% of the overall marine cargo policies had adopted the clause. The Clause operates as a reminder to the insureds of their legal duties in respect of forced or child labour.

*"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."*

In 2024, the Fidelis Group, together with The Fidelis Partnership, remains committed to continue promoting the use of the Clause in marine cargo contracts, with the Clause included in all quotes provided by Fidelis Group to increase engagement on the subject and ensure appropriate due diligence is undertaken on prospective clients and their businesses. In addition, Fidelis Group continues to engage in its work with Anti-Slavery International.

The Fidelis Group, via the underwriters at The Fidelis Partnership, has also included the Clause when providing cover for high-risk industries in other lines of business in countries with a known vulnerability to forced labour – for instance, garments, mining or commodities such as cocoa and sugar, and in certain Direct and Facultative contracts where relevant.

In addition to the use of the Clause in our day-to-day underwriting, The Fidelis Partnership's standard underwriting process requires that agreed social and environmental standards are upheld – this includes topics related to human rights and forced labour. Checks are performed by The Fidelis Partnership's Sustainability function where relevant, and if The Fidelis Partnership is not satisfied that its standards are met, they will not underwrite the risk on behalf of the (re)insurers. This further embeds due diligence on forced labour topics within underwriting.

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.

In 2024 we commit to requiring any third party service providers and vendors to agree contractual clauses which set out a zero tolerance policy in relation to modern slavery within the supply chain.

## 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 (via our partnership with The Fidelis Partnership) conduct due diligence on counterparties assessing the potential risks of inadvertently supporting slavery or human trafficking within our business and supply chains.

## 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 Policy and

## Procedure 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 2024 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: 4 November 2024