

Modern Slavery

Howden Group Holdings - Modern Slavery Statement

This statement applies to Howden Group Holdings Limited and subsidiary companies (“the Group/we/our/us”) and is made pursuant to section 54(6) of the Modern Slavery Act 2015 (the “Act”). It constitutes the Group’s slavery and human trafficking statement for the financial year ended 30 September 2022.

About the Group

Howden Group Holdings is a leading international insurance group with employee ownership at its heart. Founded in 1994, it comprises Howden Broking and the underwriting business DUAL.

We are an international business, headquartered in London, with offices in 45 countries, including over 200 local offices in the UK & Ireland. We operate across Europe, Africa, Asia, the Middle East, Latin America, the USA, Australia and New Zealand, employing 13,000 people and handling \$30bn of premium on behalf of clients.

Our structure

The Group has a devolved governance and operating structure with a central shared services function working from our London office. Each business is managed in-country and in accordance with local governance and regulation. We have policies and procedures in place where relevant and required, and adapt these to best meet local regulation, requirements and practices, and to best manage our businesses and people.

Due to the nature of our business and size of many of our offices, we have a decentralised procurement model which utilises local buying and operational team members.

Our staff are engaged on full-time, part-time, or flexible working arrangements and are appropriately remunerated and incentivised. Contractors may be employed by the Group from time to time, but these are largely professional workers for specific projects.

Modern Slavery

The Group remains committed to being a responsible global business and recognising the importance of tackling modern slavery in our businesses.

We are committed to the welfare of all of our staff, including in terms of pay, working hours, environment, health & safety, and wellbeing. We will not tolerate violations of basic human rights or employment practices, by or against any staff, or within our supply chain.

As a professional service provider, we believe that insurance is not deemed to be a key risk sector as our staff work in roles that are primarily office based and/or generally require specialist qualifications. Therefore we have assessed our risk of modern slavery to be low.

We recognise the need to continue to work with our suppliers to tackle modern slavery in their own supply chains.

We continue to support the principles contained within the Universal Declaration of Human Rights and the International Labour Organization Core Conventions on Labour Standards.

Our Supply Chain

Our supply chain primarily consists of professional, insurance and consulting services, along with property and purchased equipment, and our use of hospitality and travel providers.

We continue to evaluate the risks of each of our supplier groups and the most effective methods and procedures to identify and eliminate modern slavery or human rights breaches.

Due Diligence

We continue to work on programmes and initiatives across our businesses to embed the evaluation and communication of our modern slavery and human rights requirements into supplier selection and management activities, including through legal and tender processes.

Many of our key suppliers complete a due diligence questionnaire, which includes questions on actions suppliers are taking to address modern slavery in their own supply chains. We also have clear policies for engagement and contracting individuals to work in our business.

In one of our core businesses we have been working to establish a more formal legal review process to include due diligence, modern slavery and human rights factors.

Training

We provide training to relevant staff members to understand the risks of modern slavery and human trafficking in our supply chains and business. This training covers explanations of what constitutes modern slavery and high risk areas, warning signs to be aware of and what action or steps to take in response. The Group continues to roll out the modern slavery module of this through compliance training for each business and their employees.

Policies

The Group has a number of policies to mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations. The policies across the group vary, but include: Code of conduct, whistleblowing, grievance and human/labour rights.

Looking forward

As we grow as a business, the importance, number and scale of relationship in our supply chains grow too. We continue to take steps to assess areas where modern slavery could be a possibility, and look at the best and most effective mechanisms to manage these.

In 2023 we are creating a responsible sourcing working group to look at these and wider ethical and environmental considerations in our suppliers and supply chains. The aim of this group is to continue our work to date on mapping the risk, issues and positive practice in our supply chains, to identify areas of focus and good practice and share them across the group.

We will also be building further on our supplier due diligence practices to assess and manage human and labour rights, including identifying opportunities to utilise the Ethical Trading Initiative (ETI) Base code practice and guidance, along with wider governance and environmental considerations.

Our modern slavery and human trafficking statement for the financial year ending 2022, has been approved by the Board, as reflected by the Group CEO's signature below.

Slavery and human trafficking statement as required under s54, Part 6, of the Modern Slavery Act [1] 2015 for the financial year ending 30 September 2022.



A handwritten signature in black ink, appearing to read 'D Howden'. The signature is fluid and cursive, with a long horizontal stroke at the end.

David Howden, Group CEO
16th March 2023