Modern Slavery and Human Trafficking Statement

Irwell
INSURANCE COMPANY LIMITED

IRWELL INSURANCE COMPANY LIMITED MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that Irwell Insurance Company Limited ("Irwell") has taken, and continues to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Irwell understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

Irwell has a zero-tolerance policy towards modern slavery. It will refrain from entering business and will discontinue any current business with any other organisation which Irwell believes may knowingly or recklessly support or otherwise involve itself in slavery, servitude and forced or compulsory labour.

Irwell is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

DEFINITIONS

Irwell considers that modern slavery encompasses:

1. **Human trafficking.** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.

2. **Forced labour.** Any work or services people are forced to do against their will, usually under threat of punishment.

3. **Debt bondage / bonded labour.** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.

4. **Descent-based slavery (where people are born into slavery).** A very old form of slavery, where people are treated as property, and their "slave" status has been passed down the maternal line.

5. **Child slavery.** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.

6. **Forced and early marriage.** When someone is married against their will and cannot leave. Most child marriages can be considered slavery.

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7. **Domestic servitude.** Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

(Source: www.antislavery.org)

ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN

Irwell is a privately owned, UK-registered and authorised insurance company operating exclusively within the United Kingdom. The company is governed by a Board of Directors and headquartered in Manchester.

Irwell underwrites general insurance products across assistance, legal expenses, liability, and miscellaneous financial loss classes. These products are distributed through a network of regulated intermediaries, via Managing General Agents ("MGAs"), who act as our appointed distribution partners.

Outsourcing is a central feature of Irwell's operating model. Key functions such as underwriting support, claims handling, and administrative services are delivered through third-party providers, all of whom are subject to contractual obligations that include compliance with applicable laws and ethical standards.

Although Irwell considers its exposure to modern slavery risk to be low—given the UK-only scope of its operations and supply chain—it acknowledges that outsourcing, particularly in relation to claims and operational support, can introduce potential risks. The company is committed to mitigating these risks through due diligence, supplier oversight, and proportionate controls tailored to the nature of its business.

The 2025/26 financial year is the second year against which Irwell has published a Modern Slavery Statement, with turnover exceeding the £36m threshold during the year and with all business having been carried on in the UK.

OUR POLICIES

Irwell operates a number of internal policies to ensure that we are conducting business in an ethical and transparent manner and to mitigate the risk of modern slavery in its operations. The policies include, but are not limited to, the following:

1- **Whistleblowing Policy:** Encourages employees to report any suspected illegal or unethical activities or behaviour, including any concerns about treatment of individuals within our business or supply chain, without fear of reprisals.

2- **Anti-Bribery & Corruption Policy:** Reinforces our commitment to acting with integrity and ensures that bribery or corruption are not tolerated. Such conduct can often facilitate exploitative labour practices, including modern slavery.
3- **Code of Ethics and business conduct:** Outlines the ethical standards expected from all employees and stakeholders.
4- **Financial Crime Policy:** Human trafficking and modern slavery are often linked to illicit financial flows.
5- **Remuneration Policy:** Promotes fair and lawful remuneration practices that support equality and transparency.

PEOPLE IN OUR BUSINESS

Irwell has employment controls in place to ensure that all employees have the legal right to work in the United Kingdom and are protected under relevant employment legislation. This includes verification of right-to-work documents such as visas and passports during the recruitment process. These checks are reviewed and revalidated as necessary, and our procedures are subject to annual review to ensure ongoing compliance.

As part of our onboarding process, Irwell engages third-party background screening providers to conduct employment history, identity, and right-to-work checks, helping to confirm the legitimacy and ethical standing of new hires.

All labour directly engaged by Irwell to deliver services is based in the United Kingdom. Irwell does not utilise any form of forced, bonded, or involuntary labour. We strictly adhere to — and often exceed — the minimum standards required under UK employment law.

Irwell offers only guaranteed-hours employment contracts; we do not engage employees on zero-hours contracts. Part-time and fixed-term employees are entitled to the same pro-rata contractual benefits as full-time, permanent staff, unless there are objectively justifiable reasons for variation in treatment.

The company is committed to fair, equitable, and transparent remuneration practices. Our Remuneration Policy promotes equality and legal compliance, in line with our values and obligations under the Modern Slavery Act. Employees receive competitive salary packages and a range of benefits, reflecting our commitment to attracting and retaining high-quality talent.

To support employee wellbeing and engagement, Irwell regularly conducts anonymous staff surveys. These provide employees with a confidential channel to express views on their roles, departments, and the wider organisation, helping us to continuously improve working conditions and identify any emerging risks, including those related to labour exploitation.

SUPPLIERS TO OUR BUSINESS – OVERSIGHT

Irwell recognises the importance of maintaining clear oversight of all third-party suppliers to ensure that ethical, legal, and compliance standards are upheld, including those relating to modern slavery and human trafficking.

Our supplier management framework includes **pre-engagement due diligence**, **contractual controls**, and **ongoing monitoring**. Due diligence is conducted on all material suppliers prior to engagement and is repeated **at least annually** thereafter. This review includes requesting information from suppliers about the policies, procedures, and safeguards they have in place to prevent modern slavery.

Where possible and appropriate, Irwell has also included clauses in new contracts with suppliers requiring them to maintain and implement policies designed to ensure that there is no modern slavery in their business or supply chains.

Irwell makes a contractual requirement with its supply chains that those organisations, amongst other things, will: not use any forced, bonded or involuntary labour; implement due diligence procedures to ensure that there is no slavery or human trafficking in any part of their supply chain; upon request, report to Irwell on the steps taken to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. In rare cases where a formal contractual clause is not in place, Irwell ensures that suppliers demonstrate their commitment through publicly available modern slavery statements on their websites, in line with the expectations set out in the UK Modern Slavery Act 2015.

Irwell maintains a record of supplier responses and is committed to monitor any potential red flags or non-compliance issues. Where concerns are identified, Irwell will engage with the supplier to seek clarification and may take appropriate action, including terminating the relationship if necessary.

As part of our established supplier governance arrangements, Irwell has implemented a structured approach to monitor our supply chain due diligence. This includes:

- A centralised and regularly updated record of supplier assessments and responses.
- Monitoring of supplier engagement and any remediation activity following concerns.
- Annual tracking of due diligence completion rates across our supplier base.
- The use of internal metrics to measure the effectiveness of supply chain oversight and inform strategic improvements.

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These tracking measures continued to be embedded into our existing governance and assurance processes during the 2025/26 financial year, allowing us to continually improve on our processes and approach to tackling modern slavery. This reflects our intention not only to meet the requirements of the Modern Slavery Act but to proactively raise standards and promote ethical business practices across our operations and partnerships.

To provide further assurance, Irwell's Internal Audit function periodically reviews supplier management controls, including adherence to due diligence procedures and contractual obligations. Findings are reported to senior management and the Risk Committee, and any weaknesses identified are addressed through action plans.

This systematic approach enables Irwell to identify trends, address emerging risks, and continuously enhance the integrity and transparency of its supply chain.

TRAINING

Irwell believes that raising awareness is a critical element in preventing modern slavery. All relevant employees receive training commensurate with their role and exposure to risk.

Upon commencement of employment, all employees undergo a structured digital induction that includes reference to Irwell's Code of Conduct and policies on ethical behaviour.

In addition, all staff complete a mandatory annual compliance module that includes guidance on how to recognise and respond to signs of modern slavery or human trafficking.

This ensures a high level of understanding across the organisation, enabling staff to identify suspicious activity, report red flags, and help maintain an ethical, compliant business environment.

CONTINUING COMMITMENT

This statement will be reviewed and updated for each subsequent financial year.

We will continue to identify key risk areas in our supply chains and strengthen our governance and controls, where appropriate; work collaboratively with our supply chain to promote zero-tolerance approach to slavery and human trafficking; and continue to safeguard whistleblowers.

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In doing so, we will actively continue to:

- Incorporate Modern Slavery Act clauses in Irwell's supply chain contracts.
- Undertake a risk-based assessment of a sample of suppliers annually.
- Address concerns regarding modern slavery as they arise and track remedial actions..

This statement relates to the 2025/26 financial year ending 31 March 2026 and was approved by the Board on 24 June 2026 and signed on its behalf by:

Christopher Breakwell
Chief Risk Officer

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Irwell
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Irwell Insurance Company Limited.

Registration Number 02887406. Authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) and the PRA to conduct general insurance business.

PRA Registration No. 202897

MGAA

AM BEST B++ GOOD Financial Strength Rating