

Modern Slavery and Human Trafficking Statement 2025

2025 Modern Slavery and Human Trafficking Statement

This statement covers the activities of Intact Insurance UK and its subsidiaries (“Intact Insurance”) and is our Modern Slavery and Human Trafficking statement for the financial year ended 31 December 2025 required under the provisions of the Modern Slavery Act 2015 (the “Act”).

Modern slavery in all its forms of slavery and servitude, forced or compulsory labour and human trafficking will not be tolerated within our own operations or our supply chain. We are committed to doing our part to help raise awareness of modern slavery and improve transparency and are taking the appropriate steps to ensure that those who work for Intact Insurance benefit from a working environment in which their fundamental human rights are respected and those that we do business with also uphold these principles.

Background

Intact Insurance is a leading international insurer, with core markets in the UK, Ireland and Europe. Our parent company, Intact Financial Corporation, is headquartered in Canada. We have over 5,600 employees across our business and in 2025 our Net Written Premiums were £3,385m. Further detail on the structure and performance of Intact Insurance can be found in the Strategic Report section of the Annual Report and Accounts 2025 which is available www.intactinsurance.co.uk.

We develop trusted brands that deliver great service and products to our customers. We are driven to help businesses to manage their risks well, and to support them to recover if things don't go as planned.

We are focused on building resilient communities. That means helping society and our customers adapt to the impacts of climate change, investing in skills to help communities access opportunities for growth and prepare for the future, as well as supporting the wellbeing of communities where we operate. More information can be found in our Annual Report and Accounts available on our website and in the annual Intact Financial Corporation Social Impact and ESG Report, available at www.intactfc.com.

The information in this statement details policies, processes and actions we have taken to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our own business.

Assessing our risks

We have identified that the highest areas of risk and potential touchpoints for modern slavery within Intact Insurance are recruitment and engagement with third parties through our supply chain.

We review our policies on an annual basis to ensure they remain fit for purpose, manage risks and reflect good practice. Following a review in 2023 we launched a refreshed modern slavery internal training module, an in-depth review of our escalation process for potential incidents, and updated guidance for underwriters where there may be an enhanced exposure to modern slavery based on the location and sector of business.

Our Human Rights Policy and our Employment Practices Governance Document, which are linked to our Modern Slavery Act statement, are designed to provide clarity on expectations of our business operations. We have also extended the scope of our Third-Party Risk and Outsourcing Policy to apply to all third-party relationships. Our policies follow a template that clearly articulates the controls we have in place and validation we conduct over our policies to establish that they are being implemented across our business. We publish an external version of our Human Rights Policy on our website, which sets out our commitments.

Supporting policies and governance documents

The following company policies support us in ensuring that modern slavery is not taking place in our supply chains or business:

- **Human Rights Policy:** sets out the human rights standards and principles we respect and support in line with the Universal Declaration of Human Rights (UDHR) and the International Labour Organisation (ILO) core conventions on Labour Rights.
- **Third-Party Risk and Outsourcing Policy:** demonstrates robust standards and processes are in place across our business to manage risks relating to Intact Insurance's relationships with third parties, including ongoing management. The Policy sets out controls to comply with regulatory and legal requirements, including that appropriate assessment of risks associated with services are undertaken to meet human rights commitments.
- **Procurement Policy:** establishes clear controls and processes across our business to manage supplier selection, contracting and ongoing monitoring.
- **Employment Practices Governance Document:** sets out the Intact Insurance UK minimum standards for local people policies and processes across the employee life cycle, including how we recruit, manage and support our people in a

working environment that promotes diversity, respect, integrity, safety and wellbeing. The policy also stipulates that, where there is inappropriate conduct, we will take disciplinary action, which may include termination of contracts.

- **Speaking up and Whistleblowing Policy:** encourages our people to raise concerns, without fear of retaliation, about how we do business or operate as an employer. We provide numerous ways for concerns to be raised: in person to a line manager or our People function, or online or by phone to an independent reporting channel. In all cases, we treat concerns seriously, confidentially and provide the option for them to be raised anonymously. In addition, should an employee be concerned about how they are personally treated at work, sometimes referred to as a 'grievance', they are encouraged to raise this with their line manager and processes are in place for these to be fairly investigated.

These policies apply to Intact Insurance and, under the governance of our Risk Management Framework and Board Governance, Conduct and Remuneration Committee, reinforce how we identify, measure, manage and control related risks, including those related to modern slavery.

Each policy has a local policy owner who ensures that it is communicated and implemented across our operating countries and subsidiaries. The policies are available to our workforce via our intranet sites and, where appropriate, employees complete annual training modules to ensure they understand their responsibilities.

Our people

To ensure that we recruit and treat employees fairly, and to avoid exposure to modern slavery, our Employment Practices Governance Document establishes procedures designed to ensure we:

- recruit, select and screen individuals in a fair, lawful and professional manner;
- treat all people fairly while working for us; and
- have procedures in place for employees to raise concerns, if there is an occasion when an employee does not feel that they have been treated fairly.

We make our people aware of our policies and of their employment rights in several ways including: intranet sites, company inductions, written employment offers, employment contracts and training modules. We provide employees further opportunities to stay informed and representative forums for their voice to be heard, for example through the Employee Representative Body (ERB), Unite the Union and The Managers' Association. Further, we have employee resource groups, the European Works Council (EWC), and an internal diversity and inclusion council.

In recognition of the heightened human rights and modern slavery risk at recruitment stage, our Employment Practices Governance Document stipulates the standards for fair and lawful processes, including checks of candidates' right to work, and suitability for the role. Our approach applies to all employees and temporary workers.

We work in partnership with external recruitment providers who manage the end-to-end recruitment process from attraction and screening, through to offer and onboarding. Where we partner with providers in this way, they must comply with the agreements we have in place and be accredited to our satisfaction. This includes completing human rights and modern slavery due diligence assessments. Our internal recruitment experts oversee the end-to-end process to monitor that our standards are followed.

We conduct regular monthly checks on our UK payroll for duplicate bank accounts, which can be a warning sign of forced labour. If any duplicate accounts are identified, we verify that the employees are in a relationship with a joint account. No concerns have been identified through our checks.

Our policies and belief in a fair and inclusive culture and ways of working are brought to life through our company Values (Respect, Integrity, Customer-driven, Excellence, Generosity), and performance management processes. To identify and manage risks that may lead to a failure of ethics, controls or governance before they occur, we conduct employee surveys and review contributions from our People function and Risk and Audit leaders.

Our employees are made aware of the principles of human rights through our Human Rights Policy. This explicitly states that we will not use forced or compulsory labour, alongside our commitments to the right to equal opportunity and non-discriminatory treatment, supporting freedom of association and collective bargaining, paying workers a fair wage, providing a healthy and safe working environment and not paying bribes.

All employees are required to complete an e-learning module on whistleblowing which provides guidance on how to raise concerns in a secure and confidential way. If an employee has any concerns that they want to bring to the attention of the business, including concerns about modern slavery and human trafficking, they can raise these with a line manager, our People function or can use EthicsPoint, an independent third-party service provider. Through our formal channels of reporting there were no cases of modern slavery issues raised in 2025.

In 2024, we reviewed our modern slavery escalation processes to test that our business is equipped to respond to any cases of modern slavery should they be raised through our reporting channels. Reporting channels and formalised internal guidance for the escalation, investigation, and remediation of concerns raised related to modern slavery are made available to our people. Our employee facing reporting guide and Speaking Up and Whistleblowing case management guide were updated in 2025 so that there is consistency with the revised approach.

We comply with the relevant law and regulation regarding paying a minimum wage in the countries where we operate. Within the UK, everyone working directly for Intact Insurance, either through employment or an agency arrangement, receives the Living Wage, which is reviewed annually. We are proud to be accredited by the Living Wage Foundation as a Living Wage Employer.

Our suppliers

Our supply chain is made up of around 770 indirect and direct suppliers, largely based in the UK and Europe. Our indirect supply chain provides products and services for our operational functions, including professional services, IT services and facilities management. Our direct supply chain supports our claims functions across various sectors, such as legal, property and motor.

We choose to work with partners that hold the same high standards as Intact Insurance, deliver high-quality products and services, and respect the communities and environment in which they operate. This includes partnering with suppliers who take ethical conduct seriously - providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

Our Third-Party Risk and Outsourcing Policy establishes the requirements for due diligence and ongoing management of third parties and our Procurement Policy sets out the requirements related to supplier selection and contracting. Our procurement and legal teams work closely with the business and potential suppliers to ensure these are adhered to. These policies confirm key requirements and expectations on procurement processes, risk management and monitoring activities.

Complementing our Third-Party Risk and Outsourcing Policy, our Third-Party Management Framework assesses supplier risk before appointment and facilitates monitoring of ongoing supplier relationships. We work with a third-party supplier information and risk management provider to gather information on controls and management practices on a range of subjects including labour practices, human rights, diversity and inclusion and anti-bribery and corruption. Suppliers are asked for their policies and to confirm the actions they take to manage human rights and modern slavery risks which are reviewed periodically.

We ask our suppliers to reconfirm their answers to our due diligence questions on environmental, social and governance (ESG) topics (including human rights and modern slavery) annually, and new suppliers are on-boarded during the contracting process. In addition to our annual assessments, our regular supplier relationship management process covers a range of topics including ESG practices. Oversight of this process is provided by our Third-Party Oversight Committee, which provides governance, oversight, and strategic direction for the organisation's third-party risk management framework.

Our direct (claims) suppliers are subject to additional due diligence during onboarding. As part of the review process, suppliers are assigned a Critical, High and Low Risk rating, including reporting, training, recruitment and supply chain due diligence. Where opportunities are identified to improve supplier performance these are logged on an action plan and assigned a status and action owner. Our Claims Supply Chain team directly engages with flagged suppliers to track progress. Completed and overdue actions are reported on a quarterly basis to the Chief Operations Officer Risk and Control Committee. Suppliers are periodically subject to risk-based due diligence site visits in which they are asked to demonstrate policies, including a Modern Slavery Statement, where relevant, and associated modern slavery training modules. We conducted 14 due diligence reviews in 2025.

Our Third-Party Risk and Outsourcing Policy is supplemented by our publicly available Supplier Code of Conduct (the 'Code') which is included in new and renewing services agreements. Where we suspect a breach of the Code or become aware of a case of modern slavery, we will work with the supplier to implement remedial action. Intact Insurance reserves the right to terminate a relationship with a supplier that is unable to demonstrate compliance to the Code or progress towards the eradication of modern slavery within their organisations and supply chain. We recently initiated a review of the Code to standardise our expectations for suppliers at a Group level and an updated Supplier Code of Conduct is to be published in 2026.

Our customers

Intact Insurance UK operates in a global environment and provides insurance to international customers and their global operations. As part of maintaining an appropriate level of scrutiny for the work we do, Intact Insurance operates a High-Risk Country Framework. This incorporates guidance and requirements to refer the writing of certain business or the payment of certain claims to a more senior level where a matter is linked to a country or sector that Intact Insurance deems higher risk in

certain regards. This includes alerts for enhanced exposure to human rights and modern slavery risks associated with high-risk countries or sectors.

We periodically monitor the extent to which modern slavery risk may be related to Intact Insurance's underwriting activities. Guidance is available to underwriters to support them to screen and assess modern slavery risk when writing business in high-risk countries or sectors. Underwriters are expected to review and document the nature and relevance of the modern slavery risk, including risk management practices, and implement risk acceptance referrals within their business as appropriate.

Training

Employees are required to complete mandatory training on topics that are fundamental to upholding our company Values. Training is on a variety of topics that support our stance on human rights and modern slavery, including anti-bribery and corruption, conduct, supplier management, and whistleblowing.

It's important that all our employees understand human rights and we provide guidance to our People, Procurement and Underwriting teams to ensure they are equipped to follow the processes that support us to identify and address modern slavery concerns. We have hosted a modern slavery and human trafficking e-learning module on our learning and development platform since 2020, which provides information on specific risks, how to spot signs of modern slavery and advice on how to engage suppliers on this topic. This was last updated in 2024 as mandatory training for employees in key roles, including Procurement, Underwriting, Risk Consulting, Counter Fraud and Financial Crime, and People colleagues. A Modern Slavery Hub is available on our Intranet with information and resources on modern slavery that our employees can access at any time.

Board approvals

This statement is made pursuant to section 54(1) of the Act, has been approved by the Board of Directors of Intact Insurance and will be updated annually in line with the Act's reporting requirements.

Signed:

Ken Norgrove, CEO, Intact Insurance UK and International