

Integrity is one of the Hiscox values, and fundamental to this is honest and fair dealing in all activities throughout the Hiscox Group.

Hiscox's anti-bribery and corruption policy is set out within the broader Hiscox Group financial crime policy, which establishes the approach, principles and requirements to comply with relevant laws and regulations, and to minimise the risk of Hiscox becoming associated with such criminal activities.

This policy applies to all Hiscox business units and subsidiaries, as well as to all employees, officers, contractors, interns, casual workers and agency workers ('Hiscox staff').

All Hiscox staff must ensure that they do not engage in any activity which breaches bribery and corruption laws or regulations. To facilitate understanding this is described broadly as:

- minimising offering, promising, giving or accepting something in exchange for inducing improper conduct on the part of someone else, either directly or indirectly;
- abusing a position of trust or power, to gain an improper advantage; and
- offering or accepting any illegal facilitation payments or 'kickbacks'.

Hiscox staff must report any concerns of this nature as soon as they become aware of them, and may do so via their line manager or a member of the compliance team. The policy also refers staff to Hiscox's whistleblowing policy and procedures, which provide alternative means of escalation should staff feel unable to report concerns through the usual channels for any reason.

Hiscox is also committed to ensuring that all staff are appropriately trained on this issue. At a minimum, all Hiscox staff must complete mandatory training, including anti-bribery and corruption training, when they join Hiscox, with further refresher training on the subject completed annually.

Hiscox's anti-bribery and corruption policy complements, and is supported by, a host of other policies including a conflicts of interest policy, gifts and entertainments policy, and Group broker remuneration policy. For example, the Group's gifts and entertainments policy confirms that it is the policy of Hiscox Group not to make political donations, which we consider to include any gift, loan or deposit given to a political party.

The Group Risk and Capital Committee is responsible for oversight of the Group's anti-bribery and corruption risk approach as part of its broader remit over financial crime, and reports up to the Risk Committee of the Board.