

At Hiscox, we endeavor to give people and businesses the confidence to realise their ambitions. Our core values that underpin everything we do help us achieve this purpose by connecting us to the business, our customers, our suppliers and each other in an ethical, socially responsible way.

We want to work with like-minded businesses who align with our values and support our goals. This Code of Conduct sets out the behaviours and standards we expect from a) all suppliers providing goods and services to or on behalf of Hiscox and b) any third parties subcontracted by our suppliers. Any supplier that has any commercial dealings with Hiscox, including brokers, coverholders, third-party administrators, outsourced service providers and specialists, and any of their subcontractors must state compliance with this Code of Conduct.

1. Integrity

Integrity is one of Hiscox's core values. Fundamental to this is honest and fair dealing in all activities throughout the Hiscox Group and our supply chains. **Our suppliers must adhere rigorously to applicable legislation and regulations, both in letter and in spirit, in all jurisdictions in which they operate.** In particular, we expect them:

- to maintain an anti-bribery and corruption policy and abide by all relevant legislation;
- not to commit any form of fraud, money laundering, tax evasion, market abuse, sanctions violations or terrorist financing; and
- to comply with applicable antitrust and competition laws.

2. Diversity and Inclusiveness

Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the principles of the Hiscox Group DEI Policy (incorporating equal opportunities) in that they will seek to ensure that; **Suppliers do not victimize, harass or discriminate against any employee or party to the contract due to their sex, gender, gender identity, sexual orientation, ancestry, disability, age, religion, beliefs, marital status, military service, veteran status, genetic information, social class and race including colour, nationality, citizenship status, ethnic and/or national origin.**

Suppliers will be required to:

- meet the requirements of any applicable discrimination legislation
- have a policy regarding providing a work environment that is free of unlawful harassment and discrimination based on any legally protected characteristic.

It is Hiscox's commitment that diverse business enterprises shall have equal opportunity to compete for all goods and services to become preferred suppliers and/or subcontractor(s) for the organization. Our suppliers will be treated fairly and equally during the tendering and purchasing process, with decisions made on the basis of clear selection criteria.

Hiscox is committed to the development and growth of diverse business enterprises to build a better working world and to expand networks to build trusted and enriched relationships.

3. Conflicts of Interest

Maintaining a culture of transparency and accountability, Hiscox is committed to identifying, assessing and effectively managing the risks relating to conflicts of interest insofar as they relate to the Group. **Suppliers must not directly or indirectly offer improper payments or inducements to Hiscox members of staff that may prejudice their ability to act in the best interests of Hiscox or detract from the impartiality that Hiscox demonstrates in its supplier engagements and decision-making process.** All actual, potential or perceived conflicts of interest, such as family relation or business relationship, must be disclosed in a transparent manner to our Procurement team. Suppliers should also:

- identify and maintain records of any material conflicts within their business;
- ensure that appropriate controls are in place which are proportionate to the level of risk posed by the particular business they carry out;
- provide their staff with adequate training in identifying conflicts of interest and understanding relevant procedures as well as their individual obligations; and
- ensure that boards and committees are provided with appropriate information to enable them to oversee the management of conflicts of interest.

4. Human Rights and Labour Practices

Hiscox is committed to upholding the human rights of workers and advocating fair employment practices. **We expect that all suppliers support the protection of human rights and are not complicit in violations or abuses of such.** They shall:

- act pursuant to all applicable anti-slavery and human trafficking laws and regulations, taking a zero-tolerance approach to slavery, forced labour,

human trafficking and child labour in any part of their business or supply chains;

- comply with all applicable wage and working regulations;
- respect the rights of workers to freedom of association and collective bargaining in line with local regulations;
- seek to increase procurement with diverse suppliers and diversity of their governing boards.

5. Health and Safety

It is our policy to provide a work environment that ensures the health, safety and welfare of all our workers as well as those affected by our operations. **We consider it a moral duty for all employers to do so and therefore expect our suppliers to fulfil this by complying with applicable health and safety legislation and regulations. They shall also have in place business management practices** that cover the following elements:

- providing all workers with adequate health and safety training and information;
- carrying out regular risk assessments and maintaining emergency evacuation procedures;
- monitoring and reporting on health and safety performance; and
- enabling workers to meet their responsibilities for maintaining a safe and healthy workplace.

6. Environment

Hiscox has a responsible approach to managing the environmental impact of our business activities and actively seeks to minimise it. In line with our environmental policy, **we expect our suppliers to ensure business practices meet all applicable environmental laws and regulations and encourage them to have policies for effective environmental management** in support of the following efforts:

- purchasing energy from renewable sources where possible;
- operating effective waste management systems; and
- monitoring and reporting on environmental performance.

7. Risk Management

Suppliers are expected to have robust risk management and assurance processes in place that are proportionate to the size of the organisation and the goods or services provided, covering key risk areas including, but not limited to, information and cyber security, privacy, business continuity, supplier governance, financial crime, and regulatory compliance. This ensures that we work with operationally resilient businesses and thereby safeguards the relationships between us and our suppliers.

8. Compliance

Our suppliers must have management and governance processes in place to maintain the standards set out in this Code of Conduct and be able to demonstrate compliance if required. They must also make reasonable efforts to monitor their supply chains, ensuring their suppliers aspire to the same standards. In line with our procurement procedures, suppliers may be required to acknowledge their adherence to the Code of Conduct in writing.

Supplier commitment to this Code of Conduct forms an integral part of our sourcing process and is taken into account when selecting new suppliers or renewing existing contractual relationships.

9. Reporting channels and grievance procedure

If, in dealings with Hiscox, suppliers become aware of any actual or suspected violation of this Code of Conduct or breach of any applicable law that affects us, they should bring it to our attention through appropriate reporting channels. We have a fair and equitable grievance process in place which we take extremely seriously and through which action can be taken where necessary.

Suppliers are encouraged to raise a concern with their Procurement contact at Hiscox in the first instance, who are duty-bound to pass on the information to senior management. If a supplier feels that this is not an appropriate route, they may bring the matter of concern in confidence to the Head of Group Internal Audit by phone or email (Chris Hood: chris.hood@hiscox.com; +44 (0)20 7614 5474).

All Hiscox suppliers worldwide can access free, confidential advice on how best to raise a whistleblowing concern from Protect (www.protect-advice.org.uk; +44 (0)20 3117 2520), an independent charity. It should be noted, however, that this is not an actual means of disclosing a concern.