HADRON

Modern Slavery and Human Trafficking Statement

Hadron UK Insurance Company Limited — financial year ended 31 December 2025

This statement is published by Hadron UK Insurance Company Limited ("HUKICL" or "the Company") pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps the Company has taken during the financial year ended 31 December 2025 to identify, prevent and mitigate the risks of modern slavery and human trafficking in its own operations and in its supply chains.

Modern slavery — which encompasses slavery, servitude, forced or compulsory labour and human trafficking — is a serious crime and a violation of fundamental human rights. HUKICL has a zero-tolerance approach to modern slavery in all its forms. We are committed to acting ethically and with integrity in all our business relationships, and to respecting human rights consistent with the principles of the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

1. Our organisation and structure

HUKICL is a insurance carrier incorporated in England and Wales, authorised by the Prudential Regulation Authority (PRA) and regulated by the PRA and the Financial Conduct Authority (FCA). Its registered office is at One Fleet Place, London. The Company underwrites commercial and personal lines business in the UK and London Market.

HUKICL operates a delegated authority and intermediated distribution model. All of its business is written through Managing General Agents (MGAs) acting under delegated authority, supported by a number of outsourced and third-party service providers.

2. Our supply chains

As a regulated insurer operating an intermediated model, HUKICL does not manufacture goods and does not maintain complex or extended product supply chains. Its principal third-party relationships comprise:

- MGAs that distribute and administer business under delegated authority;
- third-party administrators that provide claims handling services;
- providers of information technology, data, and professional and advisory services; and
- providers of office premises and related facilities.

These counterparties are predominantly located in the United Kingdom and other established, regulated jurisdictions. On this basis, the Company assesses the inherent risk of modern slavery within its own operations and direct supply chain to be low, while recognising that such risk cannot be eliminated and must be kept under review.

3. Our policies

The Company's commitment to ethical conduct and to preventing modern slavery is reflected in the following policies and arrangements, which were in force during the period:

- a Whistleblowing Policy, providing a confidential route for employees and others to raise concerns — including any concern relating to modern slavery or human trafficking — without fear of reprisal;
- a Conduct Policy and Employee Handbook, which set expected standards of professional and ethical behaviour and are supported by pre-employment checks, including verification of each employee's right to work; and
- contractual and onboarding expectations applied to MGAs and outsourced service providers as part of the Company's delegated authority and outsourcing arrangements.

The Company recognises that it does not yet maintain a dedicated, standalone anti-slavery and human trafficking policy, or a separate supplier code of conduct. Formalising these is a priority for the coming year (see "Looking ahead" below).

4. Due diligence

HUKICL seeks to address modern slavery risk through its existing governance and oversight framework, including:

- due diligence on MGAs and other third parties at onboarding and on a periodic basis, including the use of due diligence questionnaires;
- regulatory screening of relevant counterparties and transactions;
- oversight of delegated authority and outsourced arrangements through the Company's MGA oversight and outsourcing framework; and
- right-to-work and pre-employment checks within the Company's recruitment process.

As this is the Company's first statement, these arrangements are being further developed and embedded, with modern slavery considerations to be incorporated more explicitly within third-party due diligence over time.

5. Risk assessment and management

The Company considers the risk of modern slavery within its own workforce to be low, given its small, office-based and professional UK workforce operating within a regulated environment. Within its supply chain, the Company likewise assesses the risk to be low, reflecting the nature of the services it procures and the predominantly UK and regulated profile of its counterparties. The Company will continue to assess these risks and to focus its efforts where they can have the greatest effect.

6. Measuring effectiveness

As this is HUKICL's first modern slavery statement, the Company is establishing the metrics by which it will measure the effectiveness of its approach in future years. These are expected to include completion rates for modern slavery awareness training, coverage of third-party due diligence, and the number and nature of any concerns raised. No incidents or concerns relating to modern slavery or human trafficking were reported within the Company's business or supply chains during the financial year ended 31 December 2025.

7. Training and awareness

Modern slavery and human trafficking awareness training is included within the Company's 2026–27 training programme. The Company maintains open channels — including its Whistleblowing Policy — through which staff can raise concerns and is committed to raising awareness of modern slavery risks among relevant personnel.

8. Looking ahead

During the next financial year, the Company intends to:

- formalise a dedicated anti-slavery and human trafficking policy and articulate clear modern slavery expectations for its MGAs and suppliers;
- embed modern slavery considerations more explicitly within its third-party due diligence and onboarding;
- deliver modern slavery awareness training to relevant staff and track completion; and
- establish and report against the effectiveness measures described above.

Consistent with good practice, the detail and quality of our disclosure is expected to improve in successive annual statements.

Approval

This statement has been approved by the Board of Directors of Hadron UK Insurance Company Limited and is signed on its behalf by:

Colin Johnson
Chief Executive Officer (SMF1)
Hadron UK Insurance Company Limited

Signature: C D Johnson

Date of Board approval: 8-7-2026

This statement covers the financial year ended 31 December 2025 and will be reviewed and updated annually.