

## **Modern Slavery and Human Trafficking Statement for financial year ending 31 December 2023**

The Modern Slavery Act (2015) (the Act) requires commercial organisations with a turnover greater than £36M to publish a Modern Slavery and Human trafficking statement each financial year.

### **Brown & Brown (Europe) Holdco Limited**

As a provider of insurance broking and associated services, Brown & Brown (Europe) Holdco Limited (Brown & Brown (Europe)), is registered in England and Wales under company registration number 13956051. Registered office: 7th Floor 55 Mark Lane, London, EC3R 7NE.

Brown & Brown (Europe) is fully supportive of the Act and adopts a zero-tolerance approach to modern slavery in all forms in our organisation and across our suppliers.

Brown & Brown (Europe) forms part of Brown & Brown, Inc., who deliver risk management solutions to help protect and preserve what customers value most. Its four business segments - Retail, National Programs, Wholesale and Services - offer a wide range of insurance solutions and services for businesses, government institutions, professional organisations, trade associations, families and individuals. They have a strong, deeply rooted cultural foundation built on integrity, innovation, superior capabilities and discipline.

### **Organisation Structure**

Brown & Brown (Europe) has a number of subsidiaries and is one of the largest insurance intermediaries in the United Kingdom.

A Retail Division of specialist and community insurance brokers operating from more than 100 offices around the UK and Ireland, focused on delivering a specialised, personal service to their customers.

Lloyd's and London Market Brokers, which operate in the UK wholesale, global specialty insurance and reinsurance markets.

An Underwriting Division distributing specialist products via third-party insurance intermediaries.

A network solution for independent insurance intermediaries offering a comprehensive and flexible proposition that is designed to help them thrive and grow.

This statement covers the activities of Brown & Brown (Europe) which is headquartered in London and has over 3500 teammates in subsidiaries within the United Kingdom and Europe.

### **Our Commitment**

Brown & Brown (Europe) is committed to conducting its business in a fair, honest and transparent manner in compliance with all relevant laws and regulations. We seek to promote appropriate behaviour across all aspects of our business operations whilst ensuring good and consistent outcomes for our customers and other stakeholders.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited. Brown & Brown (Europe) is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

### **Our Supply Chains**

Brown & Brown (Europe) performs an important role in the insurance distribution chain dealing with its end customers, insurance intermediaries, underwriting agents, insurers and other insurance market participants. We also deal with providers of other services necessary to run our business effectively such as IT providers.

### **Risk Assessment**

We believe that we are at low risk of human trafficking and slavery occurring within our business or supply chain. Our operations are primarily office based requiring skilled teammates, in a heavily regulated sector and mostly in the UK. We do not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour. As a general rule, contractors and suppliers used by us are also not considered likely to be susceptible to this risk.

### **Due Diligence and Contracting Process**

Teammates responsible for managing suppliers and other firms involved with Brown & Brown (Europe) ensure that our values and ideals are upheld in third parties. We continue to ensure that our contracts include appropriate protections and serious violations by suppliers would lead to the termination of the business relationship.

### **Relevant Policies**

Brown & Brown (Europe) operates a number of policies that mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations.

### **Teammate Code of Conduct**

Brown & Brown (Europe) prides itself on being open and informative with regards to employment. We are intent on advancing equality and diversity within all our key activities and believe this to be ethically right and socially responsible. Diversity, inclusion and belonging are essential factors that contribute to the strength and continued growth of any business. Our Code of Conduct is contained within the teammate handbook and is accessible to all teammates.

### **Whistleblowing Policy**

We aim to ensure that all individuals working within the business feel comfortable to raise concerns and challenge poor practices and behaviours related to direct activities or in our supply chains.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy and procedures is designed to make it easy for individuals to make disclosures, without fear of reprisal and includes reference to external bodies. We provide our teammates with access to an independent confidential helpline for those that wish to raise a concern. Whistleblowing posters are displayed in all premises.

All teammates undertake training on Whistleblowing.

### **Recruitment and Selection Policy**

We use only specified, reputable employment agencies to source labour. All subsidiaries ensure appropriate controls are in place to ensure teammates have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

We do not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all teammates to enjoy, include:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our Whistleblowing Policy free of charge.

### **Training Policy**

All teammates undertake a Modern Slavery training course when joining Brown & Brown (Europe), to ensure that there is appropriate awareness within the business.

### **Internal Audit**

All Brown & Brown (Europe) subsidiaries are subject to periodic audits. Core audit work will include an assessment of the basic working conditions of our teammates.

### **Corporate social responsibility**

We recognise that our business doesn't exist in isolation nor is it simply a way of making money. We recognise that our teammates depend on our business being successful, that customers, suppliers and the local community are all affected by our business and what we do and the way in which we do it.

We work to understand the impact that Brown & Brown (Europe) has on the wider world and consider at all times, how we can use this impact in a positive way. We adopt a responsible attitude, often going beyond the minimum legal requirements and working to minimise any negative impact our business may have.

We have in place a Teammate Assistance Programme (including access to GP and counselling services). An annual engagement survey drives actionable plans to improve engagement and we actively focus on the wellbeing of our teammates and continually identify areas for improvement. We promote a flexible benefits platform including various benefits and resources to support the mental and physical health of our teammates and their families.

### **Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Brown & Brown (Europe) slavery and human trafficking statement for the financial year ending 31 December 2023. This statement has been approved by the Brown & Brown (Europe) Board of Directors, who will review and update it annually.

**Mike Bruce**  
**Chief Executive Officer**