

ARCH INSURANCE INTERNATIONAL

Modern Slavery and Human Trafficking Statement for year ended 31 December 2025

Introduction

We are committed to ensuring that no form of forced labour, including modern slavery and human trafficking, exists within any aspect of our business or our supply chains.

This statement has been published in accordance with section 54 (1) of the Modern Slavery Act 2015 in respect of the financial year ending 31 December 2025. It sets out the steps Arch Insurance International is taking to prevent modern slavery from taking place within our business or supply chains. This statement is reviewed on an annual basis and was approved by the relevant Boards of the Arch Insurance International companies listed in **Appendix 1** on or around March 3, 2026.

Structure, Business and Supply Chains

Arch Insurance International underwrites risks in the Lloyd's market, the London company market and UK regional market. Our principal business consists of authorised insurance and reinsurance companies, and companies whose purpose is to support the activities of these companies. As such, we have a relatively simple supply chain model built around supporting our core activities and maintaining our global office and technology infrastructure. We do not act as a producer, manufacturer or retailer of physical goods.

Notwithstanding the foregoing, we are committed to taking appropriate steps to ensure that modern slavery does not occur within any part of our business or supply chains, and we seek to source and purchase all products and services used in our business operations from suppliers who share this commitment.

Policies and Procedures

The following policies and procedures support our commitment to mitigate the risk of modern slavery within our organisation and supply chain:

- **Procurement Management Procedure** – This procedure applies to all employees procuring goods and services on behalf of Arch Insurance International. The main purpose of the procedure is to ensure that all new suppliers are subject to an appropriate degree of assessment and screening reflective of the rigorous regulatory regime applicable to insurance companies. The results of these assessments are used to identify risks presented by third parties and to inform the supplier selection process.
- **Supplier Code of Conduct** – This code aims to ensure that suppliers comply with human rights, environmental and social standards held by Arch Insurance International.
- **Code of Business Conduct and Human Rights Policy** – These policies implement our commitment to integrity in the conduct of our business and aim to ensure that employees perform their duties in a manner which is legally, ethically and morally irreproachable.
- **Whistleblowing Policy** – This policy encourages staff to report any suspected wrongdoing in confidence. This policy ensures that concerns will be taken seriously, investigated independently, treated as confidential and can be raised without fear of any detrimental treatment.

- **Financial Crime Policy** – This policy ensures we operate in a way that minimises the likelihood of becoming a victim of financial crime or facilitating financial crime in any way, including fraud, money laundering, bribery, tax evasion, corruption, market abuse and anti-competitive behaviour, as well as ensuring that sanctions are observed.
- **Modern Slavery Training** – We provide training to all relevant employees to ensure they understand, recognise and report any instances of modern slavery.
- **Contractual provisions** – Our standard contracts state that contracting parties will seek to eliminate the risk of modern slavery in their supply chains and/or comply with all applicable laws, including the Modern Slavery Act 2015.

Employees

Our working practices aim to respect and uphold all human rights for our employees and contractors working at our offices. We ensure we are compliant with employment legislation at all times.

As of 31 December 2025, Arch Insurance International had 935 employees in the United Kingdom.

Further Steps

We are committed to continuously improving our processes to identify and prevent modern slavery risks. Since 2025, we have required all third-party vendors supporting our important business services to annually attest that they are meeting our minimum control requirements. This includes adhering to our minimum people requirements and having appropriate policies in place to monitor and mitigate modern slavery risks within their supply chains.



Hugh Sturgess

Director, President and Chief Executive Officer
March 3, 2026

Appendix 1

Arch Insurance International Entities

This statement covers the following companies:

- Arch Europe Insurance Services Ltd
- Arch Insurance (UK) Limited
- Arch Managing Agency Limited
- Arch Syndicate Investments Ltd
- Arch Corporate Member Limited 10
- Arch Corporate Member Limited 17