MODERN SLAVERY

GUARDIA RISK FRAMEWORK 2023

1. Managing Modern Slavery at Guardia Risk

Guardia Risk is committed to continuing to mature our approach to, and capabilities for, managing modern slavery risks in our operations and supply chains over time; a commitment that aligns to the commitments set out in our Human Rights Policy. To deliver upon these commitments, the management of modern slavery is comprised of two main components:

1. A Modern Slavery Framework (Framework), which describes Guardia Risk approach to managing modern slavery within the organisation. The Framework, which is described in section 3 of this document, is owned by Group Risk, Compliance and Insurance (GRCI) and administered by Group Compliance on a day-to-day basis.

2. An annual work program which is agreed on an annual basis with the Working Group and the Executive Sponsor and sets out the actions and initiatives that the business has planned to enhance its approach to combatting Modern Slavery. These actions may span reporting periods in instances where business unit initiatives will take more than 12 months to deliver. The initiatives included in the work program are informed by the key elements of the Framework.

2.1 Governance over Modern Slavery Risk Management

Guardia Risks approach to the management of modern slavery related risk is aligned to its broader risk management approach, as set out within the Risk Management and Assessment Standard.

I.   Executive Team – The Executive Team (ET) are accountable for managing the risks that exist within their business units. This involves identifying, assessing, managing, reporting, reviewing and monitoring risks that may impact the achievement of Guardia Risk's strategic, operational and commercial objectives, and ensuring that there are systems in place to maintain adherence to relevant policies.

II.   Modern Slavery Working Group - The Working Group is a cross functional group of senior business stakeholders who are responsible for driving the implementation of initiatives to continuously improve Guardia Risks' management of its modern slavery risks. Membership, scope of work, and roles and responsibilities of the Working Group are defined in the Modern Slavery Working Group Charter.

III.   People & Culture (P&C) – Responsible for reviewing, updating and maintaining Guardia Risk's recruitment and workplace policies and processes. P&C play a key role in addressing modern slavery risks in Guardia Risk's operations.

IV.   Procurement – Responsible for maintaining Guardia Risk's approach to engaging with Guardia Risk's third-party and managing third-party risks, including modern slavery risks associated with suppliers. Guardia Risks procurement approach plays a key role in addressing modern slavery risks in Guardia Risk's supply chain.

V.   Group Risk, Compliance and Insurance (GRCI) – defines the enterprise-wide approach to risk and compliance management and responsible for supporting the business to manage risks and compliance obligations, including those associated with human rights. GRCI's governance role in the modern slavery space includes being responsible for Guardia Risks Human Rights Policy, Modern Slavery Framework, administering the Modern Slavery Working Group and overseeing the modern slavery work program.

VI.   BU Risk and Compliance Teams – responsible for supporting their business unit in the day-to-day management of risks, including modern slavery risks.

VII.   BU Personnel – responsible for managing the risks associated with modern slavery within their day to-day role.

2. The Modern Slavery Framework

Purpose of the Framework The purpose of the Modern Slavery Framework is to provide a defined, coordinated and structured approach to Guardia Risk's management of modern slavery risk in its operations and supply chains. Key principles underpinning the framework include:

• Maintaining a consistent approach to modern slavery risk management – the Framework provides an enterprise and structured approach to identifying, managing and addressing modern slavery risks across the organisation.

• A focus on continuous improvement – the Framework incorporates elements of continuous improvement to encourage the organisation to improve upon its modern slavery risk management.

• Meet stakeholder expectations – modern slavery risk management must be responsive and proactive to meet the demands of our stakeholders (including investors, customers, shareholders and the broader community)

ELEMENT

| Commitment & Governance | Risk Identification | Risk Management | Raising & Managing Grievances | Monitoring & Reporting |