Modern Slavery and Human Trafficking Statement
For the financial year ending 31 December 2025

The Modern Slavery Act (2015) (the Act) requires commercial organisations with a turnover greater than £36M to publish an annual statement outlining the steps taken to prevent modern slavery and human trafficking in their operations and supply chains.

Brown & Brown (Europe) Holdco Limited

As a provider of insurance intermediary 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, Corn Exchange, 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., a leading global insurance intermediary, who provide risk management and insurance solutions to help protect what our customers value most. Operating across four business segments - Retail, National Programs, Wholesale and Networks - we serve businesses, government institutions, professional organisations, trade associations, families and individuals. Our operations are underpinned by values of integrity, innovation, expertise and discipline.

Our Structure and Scope

Brown & Brown (Europe) is a large insurance intermediary with operations across the United Kingdom, the Netherlands and various other jurisdictions. We operate through:

- A Retail segment of specialist and community brokers, operating from more than 100 offices around the UK and the Netherlands, focused on delivering a specialised, personal service to customers.
- A Wholesale segment including Lloyd’s and London Market Brokers, which operates in the UK/European wholesale, global specialty insurance and reinsurance markets.
- A Programs segment distributing specialist products via third-party insurance intermediaries both in the UK and internationally.
- A Network solution for independent UK insurance intermediaries offering a comprehensive and flexible proposition that is designed to help them thrive and grow.

This statement covers our European operations, headquartered in London, employing over 4,400 teammates across subsidiaries in the UK and Europe.

Our Commitment

We recognise that modern slavery, which encompasses slavery, servitude, forced or compulsory labour and human trafficking - all of which involve the exploitation of individuals for personal or commercial gain, is a crime and we are dedicated to identifying and eliminating any such risks wherever they may arise.

We are committed to conducting our business ethically, transparently and in compliance with all laws and regulations, promoting fair treatment and respect for human rights.

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.

While we believe our risk exposure to modern slavery and/or human trafficking is low, we remain vigilant, particularly in areas such as facilities and IT services, where third parties may be involved.

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, the Netherlands and Republic of Ireland. 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.

Nonetheless, we recognise that no business is immune, and we take a proactive stance in identifying and mitigating emerging risks in respect of modern slavery.

Due Diligence and Contractual Controls

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 of those ethical standards by suppliers would lead to the termination of the business relationship.

Teammate Code of Conduct

Our Code of Conduct, embedded in our teammate handbook and accessible to all teammates, outlines expectations around ethical behaviour, diversity, inclusion and respect in the workplace.

We are committed to equal opportunities, non-discrimination and creating a culture of belonging and psychological safety.

Whistleblowing Policy

We foster a speak-up culture. Our Whistleblowing Policy, supported by relevant procedures, enables teammates to report unethical behaviour or concerns, including those related to modern slavery, confidentially and without fear of retaliation.

- Teammates have access to an independent, confidential helpline

- Whistleblowing posters are displayed in our offices
- Mandatory training around whistleblowing ensures awareness across the organisation.

Recruitment and Employment Practices

We maintain robust hiring processes to ensure that:

- All teammates have the legal right to work.
- Only reputable, accredited agencies are used.
- Young workers or interns are employed under appropriate safeguards and protections.

We do not engage with or tolerate child labour or forced labour. All teammates are entitled to:

- A fair wage.
- A safe, healthy workplace.
- Paid leave and sickness absence in line with statutory and contractual entitlements.
- Access to grievance and whistleblowing policies and procedures.

Training and Awareness

All new teammates complete Modern Slavery Awareness Training as part of their onboarding, and refresher modules are issued periodically. This ensures all teammates:

- Understand the signs of modern slavery.
- Know how to report concerns.
- Are aware of the company’s obligations under the Act.

Audit and Oversight

Our Internal Audit function conducts periodic reviews of business operations and supplier engagement, including:

- Working conditions.
- Employment practices.
- Adherence to internal policies.
- Effectiveness and robustness of risk management controls.

This ensures that modern slavery risks are regularly monitored and addressed by Brown & Brown (Europe).

Corporate Social Responsibility and Wellbeing

We recognise that our business does not 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) modern slavery and human trafficking statement for the financial year ending 31 December 2025. This statement has been approved by the Brown & Brown (Europe) Board of Directors, who will review and update it annually.

Mike Bruce
June 2026