



Ki Modern Slavery Framework & External Statement



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Introduction

In the UK, companies need a modern slavery framework to comply with legal requirements, uphold moral and ethical responsibilities, manage risks, protect their reputations, commit to human rights, and engage employees. For Ki, this framework ensures operations and supply chains are free from modern slavery, aligning with the Modern Slavery Act 2015 and promoting sustainable, ethical practices.

Scope

The framework applies to the activities and staff of Ki Financial Limited and its subsidiaries. The scope of the Framework covers several key aspects of Ki's business operations, including:

- **Compliance:** Ensuring adherence to the Modern Slavery Act 2015 by outlining steps taken to address modern slavery and human trafficking risks.
- **Policies and Governance:** Implementing robust governance and policies related to employee conduct, anti-bribery and corruption, and whistleblowing, managed by the Compliance and People teams.
- **Supply Chain Management:** Conducting due diligence and risk assessments in supply chains, setting expectations for suppliers to respect human rights, and including modern slavery provisions in contracts. Please refer to Ki's Procurement and Outsourcing policy on this matter for more detailed guidelines.
- **Customer Relations:** Complying with laws and ethical standards, advancing the Responsible Underwriting Framework, and excluding coverage for claims related to forced labour and human trafficking.
- **Employee Welfare:** Promoting equal opportunity, health, safety, and well-being, providing mandatory modern slavery training, and encouraging whistleblowing to report. If you have any questions regarding this policy or its implementation you should contact the Chief People Officer.



Our Commitment

Ki commits to:

- **Zero-Tolerance Approach:** We have a zero-tolerance stance on modern slavery within our organisation and across our supply chains.
- **Legal Compliance:** Adhering to the Modern Slavery Act 2015 and ensuring annual review and updates of our policies.
- **Ethical Practices:** Implementing robust systems to prevent modern slavery and human trafficking in our operations and supply chains.
- **Governance and Policies:** Ensuring strong corporate governance, supported by the Ki Executive Committee, Executive Management Committees, and Sustainability Steering Group.
- **Supply Chain Due Diligence:** Conducting risk assessments and requiring suppliers to uphold human rights and anti-slavery commitments.
- **Employee Awareness:** Providing mandatory modern slavery training and encouraging whistleblowing to report unethical practices. Please refer to the Compliance function's compliance training process on this matter for more detailed guidelines.

Responsibilities

Management Accountability

The Ki Executive Committee (KiEC) is responsible for ensuring the implementation and effectiveness of this Framework. Ki has established a Sustainability Steering Group that acts on behalf of the Board and Committees. This group oversees the implementation of our sustainability strategy, ensuring Ki has effective modern slavery processes in place.

| Governing body/ Committee | Annual Cadence | Responsibilities |
|---|---------------------------|---|
| Executive Committee (plus other relevant committees e.g. PUC) | X4 | <ul style="list-style-type: none">• Implementation: Executes the ESG strategy and integrates it into daily operations.• Monitoring and Reporting: Tracks progress and reports to the board, stakeholders, and regulatory bodies. |



| | | |
|-------------------------------------|----|---|
| | | <ul style="list-style-type: none">• Engagement: Works with employees, partners, and communities to advance ESG initiatives. |
| Sustainability Steering Group (SSG) | X4 | <ul style="list-style-type: none">• Coordination and integration: Ensures alignment across various departments and functions, and facilitates the integration of ESG principles.• Advisory Role: Provides expertise and guidance on ESG matters to both the board and the leadership team.• Stakeholder Communication: Acts as a liaison between the company and external stakeholders. |

Employee Responsibilities:

We place a strong emphasis on awareness, education, and proactive reporting to combat modern slavery within the organisation. There are several responsibilities and expectations for employees:

- **Reporting Concerns:** Employees are encouraged to raise concerns about any conduct they believe to be dishonest, corrupt, inappropriate, exploitative, or illegal through Ki's Whistleblowing Policy and internal reporting pathways.
- **Training:** Mandatory online training on modern slavery is provided to educate employees, ensuring they stay informed and compliant. All employees are required to complete the training, and Ki monitors training completion rates to ensure full participation.

Risk Management Responsibilities:

- Oversee the implementation of the Modern Slavery Framework and facilitates the identification of risk.
- Review and approve mitigation strategies for high priority risks and supports adherence to the Ki Risk Management Framework and associated policies, including the Modern Slavery Framework.

Supplier and Partner Expectations:

We have the following expectations for third parties and suppliers:

- **Respect for Human Rights:** Ki expects its suppliers to respect human rights as set out in The United Nations General Assembly International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights.





- **Contractual Obligations:** Ki reinforces its human rights expectations through contractual obligations, ensuring that suppliers adhere to these standards.
- **Due Diligence:** Ki assesses potential risk areas in its supply chains through due diligence processes to identify and mitigate the risk of modern slavery and human trafficking.
- **Modern Slavery Statements:** Ki requires suppliers to provide their own modern slavery statements as part of the procurement process, ensuring their compliance with anti-slavery provisions.

These measures help ensure that Ki's supply chains remain free from modern slavery and human trafficking, promoting ethical practices throughout the business relationships.

Please refer to our procurement policy on this matter for more detailed guidelines.

Due Diligence and Risk Assessment

The following activities reflect Ki's comprehensive approach to identifying, mitigating, and addressing modern slavery risks within its operations, supply chains, and underwriting processes.

- **Supply Chain:** Conducting due diligence to assess potential risk areas, screening all known counterparties to ensure compliance with anti-slavery provisions, and including specific provisions related to modern slavery in contracts with suppliers while requiring them to provide their own modern slavery statements.
- **Underwriting:** Promoting ethical practices through the Responsible Underwriting Framework, including specific clauses in policies to deny coverage for claims related to forced labour, human trafficking, and violations of human rights.
- **Training and Awareness:** Providing mandatory online training to raise employee awareness about modern slavery, encouraging employees to raise concerns about dishonest, corrupt, inappropriate, exploitative, or illegal conduct, and ensuring full participation and understanding. Please refer to the Compliance function's compliance training process / policy on this matter for





more detailed guidelines. Once risks are identified a risk assessment is conducted in line with the Ki risk management framework and internal controls.

Monitoring and Adherence

Each business area and function across the business act as the first line of defence and are responsible for day-to-day framework adherence within their areas of expertise. Breaches are escalated through the Chief People Officer to the EC. The Risk Management function acts as the second line, monitoring adherence and reporting breaches to the relevant committees and stakeholders. Internal Audit provides the third line of defence, assessing the policy's effectiveness. Where breaches are identified, remediation actions are agreed and tracked to completion.

The Framework will be reviewed annually along with Ki's Modern Slavery Statement to ensure its effectiveness and alignment with legal requirements.

Modern Slavery External Statement

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2025

Introduction

This statement outlines the steps Ki Financial Limited ("Ki") and its subsidiaries (the full list of entities is appended) has taken during the financial year ending 31 December 2025 to prevent slavery and human trafficking within our business and supply chains. These issues can take various forms, including forced labour, child labour, domestic servitude, sex trafficking, and workplace exploitation. We operate in the Lloyd's insurance market, which we consider to be a lower-risk sector; however, we do not regard this as grounds for complacency and take active steps each year to verify that our assessment remains well-founded. Every employee plays a vital role in identifying and reporting potential risks, ensuring that concerns are promptly addressed by senior management. This statement will be published on the UK Government's Modern Slavery Statement Registry.





Our Business

Ki, launched in 2021, operates within the Lloyd's insurance market and is Lloyd's first fully digital and algorithmically powered syndicate. Ki has quickly become the fastest-growing startup in Lloyd's history, our innovative platform uses algorithmic underwriting to deliver instant quotes, making the insurance process more efficient for brokers.

Our Position on Modern Slavery

Ki has a zero-tolerance approach to modern slavery and human trafficking in all forms. We reject any form of slavery, servitude, forced or compulsory labour (including child labour), and human trafficking. We are committed to implementing effective systems and controls to ensure these practices do not take place in our business or supply chains. We also aim to identify and manage risks related to modern slavery within our organisation and through our supply chain relationships. Additionally, we are committed to raising staff awareness on this subject.

Our policies on slavery and human trafficking

At Ki, we pride ourselves on robust governance led by our Ki Executive Committee and Executive Management Committees. They ensure that all decisions and actions are guided by transparency, integrity, responsibility, and performance. Our Sustainability Steering Group acts on behalf of our Executive Committee and Executive Management Committees to oversee the implementation of our sustainability strategy ensuring we have effective modern slavery processes in place. Our policies cover key areas such as Employee Conduct, Anti-Bribery and Corruption, and Whistleblowing, and are all accessible on our intranet. We continually review and enhance these policies to keep them up-to-date and compliant with modern slavery regulations.

Our Supply Chains

Ki's third-party landscape includes back-office suppliers (e.g. IT, consultancy, professional services) and front-office third parties supporting broking and claims processes. We assess potential risk areas in our supply chains through due diligence processes, which include identifying and mitigating the risk of slavery and human trafficking. We expect our suppliers to respect human rights as set out in the



International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights. We reinforce this expectation through contractual obligations. We screen all known counterparties and are vigilant about the potential for modern slavery in our supply chains.

During the financial year ending 31 December 2025, suppliers were assessed through our due diligence process as part of our standard onboarding and annual review cycle. No concerns relating to modern slavery or human trafficking were identified.

Our Customers

As a responsible business, Ki is committed to dealing honestly and fairly with our clients while managing the risk of unfair outcomes and maintaining industry integrity. We comply with relevant local and national laws, as well as ethical standards related to human rights and modern slavery. Our Sustainability Steering Group oversees our Responsible Underwriting Framework. We recognise that we insure a diverse range of companies and continuously consider how best to ensure that our customers comply with human rights. Additionally, we ensure that our policies include specific exclusion clauses to deny coverage for any claims arising from forced labour, human trafficking, child labour, or violations of international human rights laws. By implementing these exclusions, we promote ethical practices and ensure compliance with human rights standards within the industry.

Our People

We strive to be an equal opportunity employer, ensuring employment conditions that sustain the health, safety, and wellbeing of our employees, contractors, and visitors. Ki employees are encouraged to raise concerns about any conduct they believe is dishonest, corrupt, inappropriate, exploitative, or illegal, through channels such as our Whistleblowing Policy. We are committed to educating our people about modern slavery, and this is supported by mandatory online training. We ensure all employees complete this training to stay informed and compliant. During the financial year ending 31 December 2025, all employees completed our mandatory modern slavery training module.

Key Performance Indicators





Ki collates key performance indicators to assess the effectiveness of our modern slavery processes and controls. These are proportionate to the risk profile of our organisation and include modern slavery considerations — for example, the completion rate of our mandatory modern slavery training, which during the financial year ending 31 December 2025 was 100%.

Our Commitment

In accordance with Section 54 of the United Kingdom Modern Slavery Act 2015 (UK Act), this statement outlines the steps Ki has taken during the financial year ending 31 December 2025 to address modern slavery and human trafficking risks across our Group and supply chains, and our plans for continued improvement.

Signatory

This statement has been approved by KFL Board on 28 April 2026 and will be reviewed and updated annually. It was signed on its behalf by:

A handwritten signature in black ink, appearing to read 'Mark Allan', is enclosed in a thin black rectangular border.

Mark Allan
CEO, Ki





Appendix

| Company Name | Domicile |
|-----------------------------------|-----------------|
| Ki Financial Limited | UK |
| Ki Digital Services Limited | UK |
| Ki Member Limited | UK |
| Ki Group Services Limited | UK |
| Risk Technology Solutions Limited | UK |
| Ki Digital Limited | UK |
| Ki Managing Agency Limited | UK |