

Global Responsible Business Statement



Contents

Purpose	3
Scope	3
What is a Responsible Business	3
Business Ethics and Fair Treatment	3
Employees	4
Health and Safety	4
Responsible Business Strategy	5
Suppliers and Partners	5
Community Involvement.....	6
Ethics, Governance & Compliance	6
Staff Competency and Training	7
Policy Governance and Oversight	7
Responsibilities	7
Queries and Escalations.....	7
Document Control.....	8
Approval.....	8
Policy Review	8

Davies is committed to conducting our business in a socially responsible and ethical way. We operate in alignment with recognised Environmental, Social and Governance (ESG) principles and international standards. In doing so we adopt policies and arrangements which recognise both our own social, economic, and environmental beliefs and those of our clients and partners. As a responsible business, Davies respects the interests of, and acts with honesty and fairness towards, its customers, employees, suppliers, competitors, and the broader community. Davies respects all applicable national and international laws, regulations and conventions, while trading fairly and competitively, in all the jurisdictions that we operate. This includes alignment with evolving regulatory expectations, stakeholder requirements, and recognised global frameworks.

To support and promote good governance globally, Davies Group operates a Global Policy Framework made up of global statements, global policies, global policy supplements, and local policies. This framework ensures effective oversight, accountability, and consistent application of Responsible Business principles across all jurisdictions.

This statement forms the top level of the Responsible Business policy suite.

Purpose

Davies will adhere to all relevant regulations and good practice guidelines relevant to Responsible Business. This document sets out Davies' overarching approach to Responsible Business including governance, ethical conduct, environmental stewardship, and social responsibility. Davies Group will uphold all laws relevant and good practice guidelines to Responsible Business, within all the jurisdictions in which we conduct business. We also commit to continuous improvement, transparency, and accountability in our Responsible Business performance.

Scope

This statement applies to all directors, officers, employees, consultants, and contractors whether permanent, fixed-term, or temporary, when they are working for, or providing services to, any Davies entity globally. This including those of any Appointed Representative of a Davies entity where this policy applies to the principal firm.

What is a Responsible Business

Responsible business refers to the way in which businesses ensure that all of their activities positively affect society as a whole. The main principles surrounding responsible business is to ensure that companies work ethically, considering human rights as well as the social, economic, and environmental impacts of how they do business. The key principles are outlined below.

Business Ethics and Fair Treatment

Davies firmly believes that good ethics and good business are not only compatible but essential and together produce the best long-term results for customers and staff. Davies operates under a zero-tolerance approach to unethical conduct, including fraud, bribery, corruption, discrimination, and misconduct. Ethical business practices reflect how we will deal with our staff, our clients and customers and our supply chain. It is reflected throughout Davies's culture, our values, policies, and the way we are expected to behave.

Our vision and commitment to Treating Customers Fairly reflects and reinforces this. We have our client and customer's best interest at heart and endeavour to provide a first-class customer experience.



Davies is responsive to customer and client needs and provides a quality assured service that intrinsically incorporates all relevant legislative considerations. We maintain robust governance, controls, and compliance frameworks to support ethical conduct and regulatory adherence.

We treat our clients' customers fairly at all times and respond to issues and concerns in accordance with the business's regulatory requirements. We act with empathy and manage expectations by ensuring that everyone involved is fully informed at all times.

We understand that the quality of our service has a direct impact on our client's brand integrity. At every point in our business, we actively measure our service and implement best practice.

Employees

Davies recognises that our people are our most valuable commodity. Davies is committed to supporting our people and developing their talent. We respect the value of employees, providing good conditions of work and equal opportunities, recognising, and supporting diversity and improving employee satisfaction and through training, developing their intellectual capacity for their greater benefit and quality of life. Davies provides annual inclusion training to 100% of its employees through its structured 'Treating Colleagues Fairly' program on the Thrive learning platform.

Davies aims to select the best talent within the market in a legal, unbiased, and objective way to build a strong, diverse, and inclusive workforce that enables innovation and creativity to thrive; providing the right mix of skills and experience across all levels so that the highest level of client service and performance outcomes can be achieved.

Employees are guided by clear principles and statements of behaviour which set clear, high standards and expectations, so that collectively we work together inclusively to form a company where people want to work. We promote a culture and create a working environment that embraces diversity, and we work to ensure that individual and collective worker behaviours reflect this throughout the organisation at all times.

Davies is committed to respecting internationally recognised human rights across our operations and value chain, including alignment with the UN Guiding Principles on Business and Human Rights. We do not tolerate forced labour, child labour, modern slavery, or human trafficking and expect the same from our suppliers and business partners.

Health and Safety

At Davies we ensure that Health and Safety practices are embedded in our everyday activities and processes to ensure a safe working environment, wherever that may be.

Davies recognises that good physical and mental health and safety management makes a significant contribution to the health and wellbeing of employees as a result improving business performance.

We work hard to ensure a high standard of care for our employees and others who may be affected by our business activities. We constantly look for ways to reduce the potential for injury and ill health which in turn reduces the potential for unnecessary losses and liabilities.

We proactively identify, assess, and manage risks and promote a culture where employees can raise concerns without fear of retaliation.



Responsible Business Strategy

At Davies, our commitment to responsible business practices is founded on three core pillars: advancing opportunity within our workforce and communities (People), championing environmental responsibility (Planet), and upholding unwavering ethical standards (Purpose). This statement outlines our business objectives and commitments that guide us towards a more sustainable and impactful future.

People

Our goals include advancing social mobility and equality by providing equal opportunities for all individuals within our workforce and communities. We are committed to promoting diversity, equity, and inclusion and to supporting social mobility through targeted education, skills development, and career progression initiatives for our employees and the communities in which we operate. This includes delivering structured learning, apprenticeships, and development programmes, alongside measurable outcomes to enhance employability, representation, and long-term career progression.

Planet

Our objectives include taking proactive measures to address climate change including reducing greenhouse gas emissions, managing climate-related risks, and supporting the transition to a low-carbon economy. We are committed to delivering our environmental strategy through measurable targets, including alignment with net-zero ambitions and science-based approaches to emissions reduction where applicable.

We integrate environmental considerations into our business strategy, risk management frameworks, and operational decision-making, in line with emerging regulatory expectations and recognised reporting standards such as ISSB.

We will continue to minimise our environmental footprint through sustainable resource use, energy efficiency, waste reduction, and responsible consumption practices across our operations and value chain..

Further detail is provided in our Global Environmental Policy and Responsible Business disclosures, which outline our environmental commitments, targets, and performance.

Purpose

Our commitments include adopting and maintaining robust governance frameworks, controls, and oversight mechanisms to ensure accountability, transparency, and alignment between our culture, values, and strategic objectives.

We are committed to integrating Responsible Business and ESG considerations into our decision-making, risk management, and operational processes, and to maintaining the highest standards of ethical conduct across all our activities.

This includes compliance with applicable laws and regulations, and the consistent application of ethical principles, supported by clear policies, training, and governance structures.

Suppliers and Partners

Davies is committed to actively aim to collaborate with our suppliers and partners to uphold high standards of ethical, social, and environmental performance across our supply chain. We are committed to responsible sourcing and sustainable procurement practices, working in partnership with suppliers who operate in accordance with applicable laws and deliver positive social, economic, and environmental outcomes.



To ensure this occurs in practice, Davies has a robust supplier selection process which includes robust background checks and the completion of several due diligence requirements that ensure we are dealing with suppliers who not only have values similar to ours but are as committed as Davies to delivering those values in all they do for us.

We are committed to treating suppliers fairly and transparently, and to maintaining ongoing monitoring and engagement to drive continuous improvement and alignment with our Responsible Business expectations across the supply chain.

Community Involvement

Davies places its people and the communities in which we operate at the centre of its social impact strategy. Davies recognises the importance of contributing positively to society by supporting local and global communities, fostering employee engagement, and promoting inclusive economic and social development. We actively support charitable initiatives, community development programmes, and employee-led volunteering and fundraising activities through the Davies Foundation and other initiatives.

The Davies Foundation

The Davies Foundation is the driving force behind our community impact strategy. It supports the causes that matter most to our people while leveraging our strengths as a business to maximise positive change. Guided by ongoing engagement with our colleagues, we remain committed to backing charities and organisations that focus on education, youth, and skills development.

We deliver this impact through four key pillars: grants, match funding, long-term partnerships, and volunteering.

Apprentice Training

Davies Professional Education are a specialist provider of Apprenticeships in insurance, financial services, and regulated markets both internally and externally. We are committed to supporting the development of both our employees and individuals within the communities we serve by providing accessible, high-quality apprenticeship and training programmes.

These programmes promote skills development, career progression, and social mobility, contributing to a more inclusive workforce and supporting long-term employability across the sectors in which we operate.

Davies encourages employee participation in mentoring, training, and knowledge-sharing initiatives to strengthen community links and enhance the social value created through these programmes.

Ethics, Governance & Compliance

Davies operates an ethical business, maintaining strict compliance with all applicable laws, regulations, and recognised standards, not only as a legal obligation but as a fundamental principle of good business practice. We maintain a zero-tolerance approach to unethical conduct, including fraud, bribery, corruption, and misconduct, supported by robust policies, controls, and training programmes. Davies is committed to fostering a culture where the consistent application of high legal and ethical standards by all employees is the natural approach to business. These standards enable us to ensure that our interactions between our clients, customers and suppliers are of a high standard.



We ensure compliance with those ethical standards through a robust governance framework that is woven through all levels of our business, ensuring Board, management and personal accountability for the delivery of our policies, processes and procedures and ensuring Davies promotes a whole organisational approach.

Responsible Business and ESG considerations are integrated into our governance, risk management, and compliance frameworks, ensuring a consistent and organisation-wide approach to ethical conduct and decision-making.

Staff Competency and Training

All members of staff are expected to keep their knowledge of relevant requirements and procedures related to this statement and associated policy suite up to date.

It is the responsibility of each member of staff to ensure that they complete relevant training to maintain their individual competence. Each line manager is responsible for ensuring that their teams have access to, and can complete, such relevant training as their roles require.

Training completion and competency are monitored through governance processes and are reflected in performance management, including annual performance reviews and, where applicable, regulatory competency requirements.

Policy Governance and Oversight

Davies is committed to ensuring good corporate governance and internal controls globally, and as part of the global policy framework within Davies, our Group Compliance function undertake regular monitoring review of our policies, controls and their effectiveness.

All documents with the Global Policy Framework include requirements to ensure good governance and proper oversight.

Responsibilities

Employees, suppliers, and all other relevant parties whom this statement applies to are invited to familiarise themselves with their responsibilities and ensure these are being adhered to on an on-going basis.

Compliance with Davies Group policies is a mandatory requirement. Deviations or non-compliance with this policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary action, up to and including termination of employment, civil action and lawsuits, or referral for criminal prosecution, as allowed by local laws.

Queries and Escalations

We welcome any queries or comments in relation to this statement and any such queries regarding the statement can be raised with Responsible Business office via email to responsiblebusiness@davies-group.com

Should you have any concerns about this statement and its requirements, these can also be raised with Group Compliance, alternatively, you can refer to the Global Speak Up policy if it is more appropriate.

All applicable concerns raised in line with the Davies Global Speak Up Policy will be investigated accordingly and inaction by management of a qualifying disclosure will not be tolerated. We also confirm that no Employee will be punished or subjected to any detriment by reason of having made a disclosure in good faith.



Any harassment, victimisation or less favourable treatment of any person on such grounds will not be tolerated and will be investigated and escalated accordingly.

Document Control

Approval

Effective Date	27-Aug-2026
Version Number	7
Document Owner	Group Compliance
Approved By	James Heath, Group Chief Risk Officer

Policy Review

This document is reviewed at least annually and may be updated at any time.

The latest version is available on the Intranet within the Governance, Risk and Compliance Hub or from Group Compliance upon request.

Review, approval, and version history records are maintained within the Group Policy Management Platform and are available from Group Compliance on request.

