

Human Rights Policy

Version 1.0

Hastings

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Human Rights Policy

1. About this Policy

- 1.1 This policy ("Policy") sets out the commitment of the Hastings Group (the "**Hastings Group**", "**we**" or "**our**") to conduct business ethically and responsibly by understanding and complying with relevant legal and regulatory requirements, and relevant standards, in all jurisdictions where it operates.
- 1.2 We consider the spirit and intent of our obligations as well as the law and regulations.
- 1.3 The Hastings Group comprises the ultimate UK parent entity, Hastings Group (Consolidated) Limited and its subsidiaries, including its immediate wholly owned subsidiary Hastings Group Holdings Limited ("**HGH**"), its primary trading subsidiaries Hastings Insurance Services Limited ("**HISL**"), Hastings Financial Services Limited ("**HFSL**"), and Advantage Insurance Company Limited ("**AICL**"), and other operating subsidiaries (the "**Hastings Group**"). The respective board of directors of HISL, HFSL and AICL is the governing body of each respective subsidiary, which is each separately authorised and regulated in its own jurisdiction. HISL and HFSL by the UK Financial Conduct Authority, and AICL by the Gibraltar Financial Services Commission. The Hastings Group is wholly owned by Sampo plc ("**Sampo**").
- 1.4 This Policy is intended not to be materially inconsistent with Sampo's Human Rights and Labour Practices Statement and if any changes are made to the Sampo's Statement which compromise inconsistency with this Policy, discussions will be held with Sampo, in good faith, to resolve any discrepancy in the appropriate manner.
- 1.5 All of our actions are based on our 4Cs cultural framework which focuses on getting things right for our colleagues, customers, company, and community.
- 1.6 We endeavour to provide our colleagues with the right tools, leadership, training, environment, systems, facilities and information to enable them to perform to their best potential.

2. Purpose

- 2.1 Hastings Group is committed to upholding the highest standards of human rights in all aspects of our operations, ensuring ethical and responsible business conduct.

3. Scope of this Policy

- 3.1 This Policy applies to all Hastings Group entities, locations and activities, including our supply chain.

4. Our commitment to respect human rights

- 4.1 Hastings Group complies with all applicable human rights, labour, and employment legislation in line with Sampo's Code of Conduct.
- 4.2 We also adhere to the principles of the UN Global Compact and are committed to following the internationally recognised standards on business and human rights, such as the UN Guiding Principles ("UNGPs") on Business and Human Rights and the Organisation for Economic Co-operation for Multinational Enterprises ("OECD") Guidelines. Therefore, Hastings Group is committed to the obligations related to human rights and the continuous development of related practices including human rights impact

assessments, human rights due diligence processes, applying the precautionary principle and providing remedy, when applicable.

- 4.3 We are committed to treating all individuals with respect and dignity. We ensure equal rights and opportunities for all, without discrimination.
- 4.4 In addition to colleagues, we communicate our human rights-related commitments to different stakeholders through training, the intranet, contractual discussions, questionnaires, audits, and site visits. In line with the UNGPs, we review our business activities and relationships regarding the risk that they could cause or contribute to breaches of human rights principles, and to address the effects if they occur.

5. Our colleagues

- 5.1 We are committed to respecting human rights in the workplace and this commitment is embedded in our 4Cs philosophy and through our employment policies and procedures. We endeavour to provide our colleagues with the right tools, leadership, training, environment, systems, facilities, and information to enable them to perform to their best potential.
- 5.2 We support the articles of the UK Human Rights Act that we believe have the greatest impact on the employment relationship, being:
 - Article 6: right to a fair and public hearing
 - Article 7: right to respect for private and family life
 - Article 9: freedom of thought, conscience, and religion
 - Article 10: freedom of expression
 - Article 11: freedom of assembly and association
 - Article 14: prohibition of discrimination
- 5.3 We are dedicated to fulfilling our statutory responsibilities as an employer. We maintain a zero-tolerance policy for non-compliance with relevant employment legislation and discrimination based on protected characteristics, or any other legally protected status. We do not tolerate bullying and harassment and our progress toward creating diversity is monitored and publicly disclosed on an ongoing basis.
- 5.4 We recognise the Hastings Colleague Forum ("HCF") for statutory collective consultation and acknowledge trade union membership in individual formal processes (e.g., conduct, grievance, performance, sickness absence management). The HCF, composed of democratically elected representatives, engages with business areas to represent colleagues' views, discuss collective issues, and provide feedback.
- 5.5 We are committed to fostering constructive dialogue with colleagues to develop our business and ensure fair treatment. Forums include leader-colleague discussions, exit interviews, bi-annual engagement surveys, and councils like the HCF. Colleagues are encouraged to report unethical practices or potential violations to their leader, a senior leader, or HR. For serious concerns, a Whistleblowing platform is available. We track and monitor feedback to address concerns and incorporate improvements.
- 5.6 We ensure that our employment policies, processes, and practices are compliant with UK law and that our colleagues and their leaders recognise their individual responsibility to understand and adhere to agreed practices and standards of conduct and governance.

6. Our customers

- 6.1 We are dedicated to achieving good outcomes for all customers, including vulnerable individuals, by respecting their rights and addressing their needs.
- 6.2 Our mission is to provide clear, fair, and straightforward service. We ensure transparent and truthful marketing practices, handle complaints effectively, and take corrective actions when necessary. We offer multiple interaction methods to suit customer needs and have policies to protect them from exploitation and risk.
- 6.3 We are compliant with all applicable data privacy legislation, ensuring fairness and non-discrimination through robust processes and mandatory annual training. We maintain strong relationships with the Information Commissioner's Office and other public bodies to ensure compliance with all relevant legislation, upholding integrity, and accountability in our operations.

7. Our suppliers

- 7.1 We are committed to upholding human rights throughout our supply chain. This Policy, together with our Supplier Code of Conduct outlines our approach to human rights and labour standards, which we expect our suppliers to observe.
- 7.2 Our due diligence process, which is subject to continuous improvement, evaluates suppliers, for example, based on environmental impact, ethical practices, respect for human rights, and efforts to prevent modern slavery, requiring remediation if harm is found.
- 7.3 We aim to build strong relationships to ensure standards are met and risks managed and reserve the right to end relationships if standards are not met or abuse identified.
- 7.4 Hastings Group seeks suppliers and partners who share our commitment to ethical practices and sustainability.

8. Slavery and human trafficking

- 8.1 We are committed to acting responsibly in business relationships and ensuring that slavery and human trafficking does not occur anywhere in our business operations. Our Supplier Code of Conduct, which is shared with our suppliers, sets out our requirements.

9. Responsible investment

- 9.1 As a signatory of the UN Principles for Responsible Investment ("UN PRI"), we are committed to being a responsible investor. Our commitment is outlined in our publicly available Responsible Investment Framework.
- 9.2 We recognise that certain investments carry more risk of adverse impacts. We therefore exclude, investment in coal, controversial weapons and tobacco and undertake regular reviews of other sensitive industries including, but not limited to, adult entertainment, gambling, oil-based energy, and nuclear power. Levels of exposure and proportion of a company's net sales generated by the industry in question are reviewed by the Investment Committee to determine if additional screening guidelines should be implemented.

10. Whistleblowing channels and grievance mechanisms

- 10.1 Our Grievance Policy allows colleagues and critical outsource providers to report employment-related concerns, aiming for timely informal resolutions before formal processes.
- 10.2 Our Whistleblowing Policy protects whistleblowers from retaliation, providing a safe environment for reporting, with clear procedures for managing concerns. Hastings Group ensures that the outcomes and remedies related to the Grievance and Whistleblowing Policies accord with human rights and legislation.
- 10.3 Suppliers must notify us of any human rights violations within their business or supply chain and provide a copy of their own whistleblowing policy as part of our due diligence process.
- 10.4 We track grievances, and whistleblowing reports periodically to monitor trends, and we are committed to continuous improvement through stakeholder engagement and dialogue.

11. Governance

- 11.1 The HGH Board has overall responsibility for approving and reviewing this Statement. It is reviewed and updated as necessary, and in any event, at least annually.
- 11.2 This Policy is available both internally on our intranet for colleagues and publicly on Hastings Group's corporate website