

MODERN SLAVERY ACT 2015 SECTION 54

Slavery and Human Trafficking Statement

September 2026



Modern Slavery Act 2015 Section 54 Slavery and Human Trafficking Statement 2026

Introduction

This Modern Slavery Act 2015 Section 54 – Slavery and Human Trafficking Statement – 2025/26 (the “Statement”) is published in accordance with the requirements of the transparency in supply chains provision of the Modern Slavery Act 2015 (the “Act” or “MSA”) for the financial year ending 31 March 2026.

The ANV Group (“ANV”) is a multinational group of Managing General Agents (MGAs) providing specialty insurance solutions across a range of products and industry sectors. ANV includes MGAs based out of or conducting business within the United Kingdom including the regulated companies set out below:

- Alan Blunden & Company Limited - offers a range of standard and bespoke insurance products to an agent base of professional insurance intermediaries
- ANV Global Services Limited – a specialist MGA covering cyber, financial, transactional risk and other professional lines
- Arc Legal Assistance Limited – a specialist provider of ancillary insurance products, including legal expense, home, motor, emergency assistance, individual accident, sickness and unemployment insurance
- Collegiate Management Services Limited – a professional indemnity MGA specialist
- Qualis UK Limited – credit risk specialist MGA writing mortgage and structured risk insurance products

ANV entities in scope of the Act as of 31 March 2026, whether by meeting the criteria or being part of the supply chain, are set out in the Annex in this statement.

The services ANV Group provides are generally regulated activities and subject to the supervision of the relevant competent authorities in the jurisdictions in which ANV Group operates.

Approach to Slavery and Human Trafficking

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains which include but are not limited to insurance and reinsurance arrangements and suppliers.

We are also committed to ensuring that there is transparency in our approach to tackling modern slavery consistent with our disclosure obligations under the Act. We expect the same high standards from all our contractors, suppliers and other business partners.

We understand that modern slavery risk is not static and we will continue to take actions to mitigate this risk in the year ahead. We will ensure that we build upon the work already completed and engage with our suppliers to determine where further action is needed.

We look to hold all our employees and suppliers or associated parties accountable to ANV Group’s modern slavery standards.

We strive to maintain the highest standards of employee conduct and ethical behaviour including as it relates to operating and managing our supply chain. Policies, procedures and training cover relevant

conduct requirements and where applicable emphasise that breaches of human rights will not be tolerated, including Modern Slavery.

Staff are required to complete an online mandatory training module dedicated to Human Trafficking. This module forms part of our mandatory training schedule. Non-completions are monitored and escalated accordingly.

Any concerns regarding modern slavery can be reported via multiple channels as noted within this Statement including via our Anonymous Global Confidential Ethics Hot Line, hosted via a third party, and accessible via the corporate Intranet homepage to make it easy for staff to make disclosures without fear of retaliation.

Due Diligence Processes

ANV continues to enhance its supplier on-boarding processes in conjunction with the Global Procurement and Third-Party Risk Management ("TPRM") policies to ensure that these remain reflective of current procedures, continue to incorporate best practices and meet the requirements of prevailing legislation and regulations.

ANV has a comprehensive supplier on-boarding and risk assessment process. Procurement works closely with supply chain relationship managers to complete the required due diligence to ensure that we manage and mitigate any associated risks, including our obligations under the Act.

Work continues to target supplier due diligence improvements across ANV, with particular focus on outsourcing arrangements throughout the supply chain, in alignment with regulatory requirements. The majority of ANV's suppliers are deemed low risk (due to their location and the types of services provided to ANV) however, we ask all suppliers to sign an MSA affirmation and, based on our risk assessment methodology, we ask that suppliers sign a contractual commitment to the obligations under the Act or have published statements detailing their commitment to the Act.

As it relates to ANV employees, we conduct "right to work" checks and background screening for our employees in line with the remit fulfilled, business and country in which the employee is based and the applicable regulations. We continue to review and identify further opportunities to enhance our screening (both on hire and during employment) across our different locations.

Reporting mechanisms

Employees, business partners and suppliers with concerns regarding modern slavery can report them through the following channels:

- a) Human Resources Department
- b) Compliance Department
- c) Confidential Ethics Hot Line (UK telephone: 0808 234 6655) – full details, including a list of international numbers, are available via the corporate intranet with the site hosted by EthicsPoint to protect anonymity
- d) <https://www.gov.uk/guidance/report-modern-slavery-as-a-first-responder> (or other relevant country government reporting mechanisms as applicable)

As at the date of this Statement, we have not identified evidence of or received any disclosure in relation to modern slavery or human trafficking in our supply chains. However, we continue to monitor our supply chains closely and to properly examine any risks identified.

Continued areas of focus and improvement

We are committed to maintaining and improving our systems and processes to prevent slavery and human trafficking. On an ongoing basis we will continue to:

- Review and identify opportunities to enhance supplier due diligence and risk assessment methodologies
- Review and identify opportunities to further highlight our zero-tolerance approach to modern slavery within our supply chains or in any part of our business throughout our policies and processes
- Include Human Trafficking as part of our mandatory training schedule for new hires and existing staff.
- Utilise our varied communication channels to reinforce our approach to modern slavery and identify opportunities to continue to raise awareness with employees
- Focus on the development and monitoring of key performance indicators in relation to hiring, training, reporting and supplier management and taking appropriate actions as needed

This Statement was approved by the Managing Board of ANV Intermediaries Limited on XX September 2026

A handwritten signature in black ink, appearing to read 'Adam Karkowsky', with a long horizontal stroke extending to the right.

Adam Karkowsky

CHAIRMAN AND CHIEF EXECUTIVE OFFICER, ANV

Date: 29 September 2026

Annex

ANV Group (effective 31 March 2026)

ANV Group Entity	Company	Website (if applicable)
ANV Intermediaries Limited	Activities of Head Offices	
ANV Global Services Limited	Managing agent	http://anv.eu.com
ANV Global Services Limited Sucursal en España	Managing agent	http://anv.eu.com
ANV Specialty Europe SL	Insurance intermediary	
ANV Specialty Spain SL	Underwriting Agency	
Alan Blunden & Company Limited	Insurance intermediary	www.alanblunden.co.uk
Arc Legal Assistance Limited	Insurance intermediary	https://www.arclegal.co.uk
Collegiate Management Services Limited	Insurance intermediary	www.collegiate.co.uk
ANV Nordic AB	Insurance intermediary	https://www.anvnordic.com
ANV Insurance Services Sweden AB	Insurance intermediary	
Qualis Europe Srl	Insurance intermediary	https://qualiscreditrisk.com
Qualis U.K. Limited	Insurance intermediary	