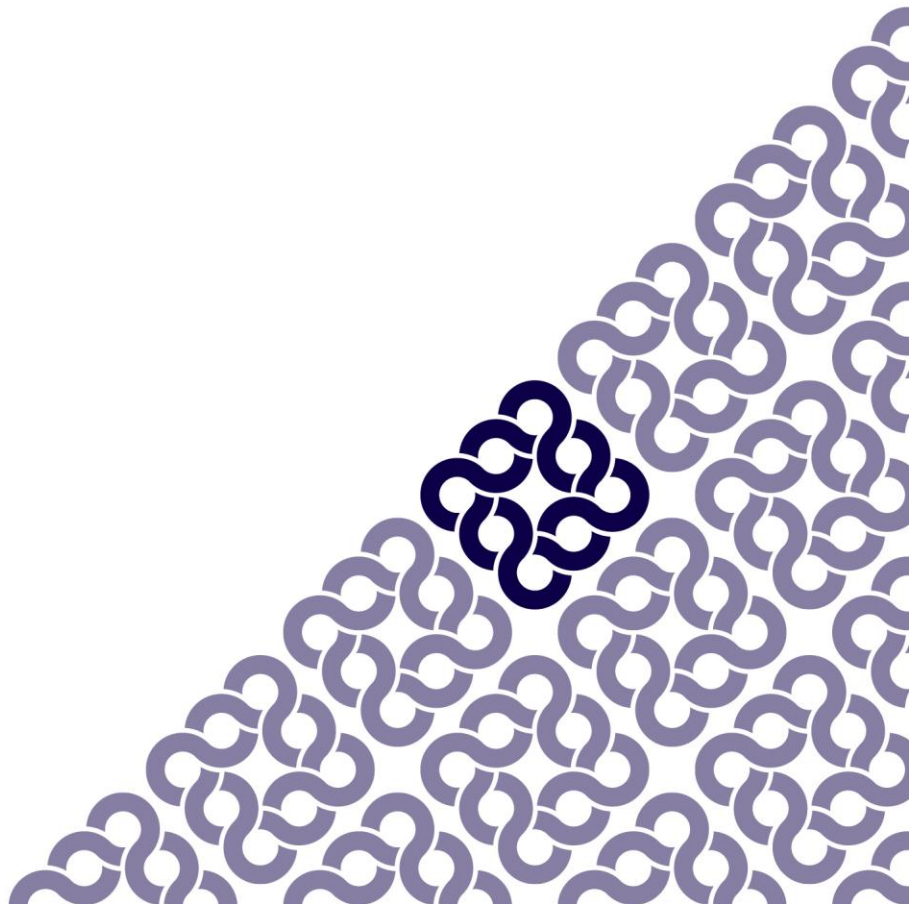


March 2026

# MODERN SLAVERY

# STATEMENT



## Our organisation structure

Athora Holding Ltd. is a private limited company registered in Bermuda. This statement covers the activities of Athora Holding Ltd. (Athora) and its subsidiaries, including its UK services operations.

Athora provides life and pension products with a focus on the European Market. Athora also provides reinsurance through its subsidiary Athora Life Re domiciled in Bermuda. Athora operates licensed trading entities operating in Germany, the Netherlands, Belgium, and Italy.

Athora currently employs approximately 1,500 staff globally.

## Our supply chains and risk assessment

Athora products are distributed within Europe and Athora does not make use of supply chains which are traditionally susceptible to an enhanced risk of slavery or human trafficking, such as factories, other entities involved in manufacturing, or business sectors which are reliant on a high degree of human labour.

Given the nature of Athora's business, we consider the risk of modern slavery in our supply chains low. However, we remain vigilant to this risk, and have in place several policies and procedures to ensure we do not knowingly do business with a company involved in any form of modern slavery or human trafficking.

Athora has a Sourcing and Vendor Management Standard and Guidelines that sets out what Athora expects of its 3rd party vendors in relation to employment standards and practices. This specifically prohibits the use of child labour, any forced, compulsory or involuntary labour, and compliance with all applicable wage and working hour laws and regulations, in addition to expectations around the fair treatment and non-discrimination towards employees.

Our material suppliers and outsourcing vendors are subject to enhanced due diligence for greater assurance of compliance with Athora's policies and expectations.

## Outsourcing

Athora may outsource certain activities to support its business. Outsourced activities are subject to extensive due diligence by Athora and may require regulatory approval. Athora has an Operational Risk Policy book setting out our approach to outsourcing, as well as the due diligence which must be undertaken before Athora outsources any aspect of its business to a third party. As part of the due diligence process, Athora checks all potential service providers for

financial soundness, employment standards and practises, sanctions and adverse media, and continually monitors providers on a regular basis.

Compliance with the Vendor Code of Conduct will be included within our due diligence criteria, further enhancing the company's commitment to conducting responsible and ethical employment practises.

## Our policies

As part of our commitment to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business, we maintain policies and procedures to support this commitment including:

- **Code of Conduct:** outlining the ethical standards that all employees of Athora are expected to follow, to ensure Athora operates responsibly and ethically. These include our commitment to respecting a wide range of human rights standards and zero-tolerance approach to modern slavery and human trafficking, including child and forced labour in our organisation and supply chain, which we expect every employee to support and adhere to.
- **Speaking Up Policy:** setting out the manner in which our staff and business partners can report any concerns relating to the activities of any Athora Group company or anyone involved in its supply chains, including circumstances which may give rise to a risk of human trafficking or slavery.
- **Recruitment and Remuneration Policies:** setting out the rights in which all our staff enjoy, including fair and reasonable wages, the right to a safe working environment, and appropriate holidays and provisions for sickness.
- **Risk Management Policies:** Athora's approach to effective risk management is outlined in its numerous Risk Management Policies. Any existing or emerging modern slavery risks will be captured as part of the risk management cycle, with mitigants.

## Next steps

Athora continuously reviews its risks in relation to modern slavery and human trafficking, both as an employer and as a purchaser of outsourced services, to identify measures we can take as a business to prevent modern slavery occurring in our business and supply chain.

We intend to take the following steps to further enhance our processes and procedures:

- Our Group Code of Conduct reinforces the importance of expected conduct in line with our values, including zero-tolerance to modern slavery and human trafficking. Training, alongside attestation of adherence, we intend to repeat on a recurring basis and as a mandatory requirement for all employees and contractors.
- Athora reviews its Operational Risk and supplier due diligence process on an annual basis to ensure our processes remain effective as the business grows. We plan to include enhanced language and specifics on modern slavery and human trafficking in our supplier policies in the coming year, including expectations applicable to all less material suppliers. To our knowledge, there have been zero instances of any breaches of supplier conduct with regard to our expectations in respect of modern slavery or human trafficking to date, reinforcing our view of the effectiveness of our processes.
- Since 2024, an external supplier due diligence platform has supplemented our existing processes with enhanced third-party data verification and due diligence over key topics, including those specifically in relation to modern slavery, child labour, and human trafficking. To date, we have onboarded our material suppliers and outsourcing providers, with our intention to now extend this coverage to all of our wider supplier relationships.

The statement has been approved by the Board and signed on their behalf by:

Mike Wells

Group Chief Executive Officer

March 2026