



Earnix UK Ltd: Modern Slavery Statement

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2025. It sets out the steps taken by Earnix UK Ltd (“**Earnix**”) and its parent company, Earnix Inc., that it has undertaken and is continuing to take in order to ensure that modern slavery or human trafficking is not taking place within our global business or our supply chain.

1. Organizational Structure and Business

Earnix UK Ltd (“Earnix UK”, “we”, “us”) is part of the global group Earnix — a provider of software and analytics solutions for financial institutions (insurers, banks, and other financial services firms). Earnix combines real-time analytics, AI-powered decisioning, and cloud-enabled SaaS delivery to support dynamic pricing, product design, risk assessment, and customer-level decisioning for insurance and financial products.

2. Policies

We believe that Earnix’s success is built on talent, innovation, and our culture. We aim to provide a working environment that respects the dignity of our employees. We strive to provide a workplace where people from all backgrounds and experiences can thrive. Earnix does not tolerate any unlawful discrimination or harassment in any form and is dedicated to providing equal employment opportunities to all qualified individuals. In order to ensure we are conducting business in an ethical and transparent manner, we have a number of global internal policies, which include:

- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Code of Conduct
- Supplier Code of Conduct
- Earnix Global Human Rights & Working Conditions Policy
- Earnix Social Dialogue Policy

These internal policies promote respect, diversity, and transparency, and are accessible to all employees via our intranet.

3. Due Diligence in Our Business and Supply Chains

Earnix undertakes due diligence within its own business operations and across its supply chains.



Internal business operations.

Within our internal operations, we conduct periodic reviews of recruitment and employment practices and maintain policies designed to safeguard employee welfare. All employees are engaged on terms that comply with applicable labour laws. We also maintain clear HR policies, background-check procedures (where permitted by law), and whistleblowing channels that enable reporting of any concerns. Based on our internal risk assessment, we consider the risk of modern slavery or human trafficking within our direct workforce to be very low.

Supply-chain due diligence.

Earnix's supply chain includes third-party service providers such as software development, marketing, recruitment, and professional services. We assess suppliers during onboarding, expect compliance with all applicable laws and regulations, and incorporate human-rights considerations into our procurement decisions. We focus enhanced due diligence on suppliers operating in sectors or geographies where modern-slavery risk is more likely to arise. We expect our suppliers to maintain standards consistent with our own. We recognize that we have a responsibility to identify and address any potential or actual human-rights impacts linked to the products and services we acquire. We encourage our suppliers to uphold and maintain the same standards we apply to ourselves, and we continue to strengthen our approach, particularly in higher-risk sectors.

4. Risk Assessment and Management

Earnix has implemented a structured risk assessment framework to address potential modern slavery and human trafficking risks within our supply chain, and it is integrated into our onboarding supplier management processes.

Risk Assessment Methodology. To determine the level of risk a supplier may pose, Earnix evaluates suppliers against a set of defined criteria: (i) **Geographic Risk:** We analyze the jurisdiction in which a supplier operates or sources labour and materials. (ii) **Sectoral/Industry Risk:** Certain industries, such as outsourced IT services, recruitment agencies, and subcontracted work, carry inherently higher risks. Suppliers delivering services in these sectors undergo additional due diligence checks. (iii) **Operational Importance and Spend Threshold:** We review the financial value and business-critical nature of the relationship.



5. Training and Awareness

Earnix maintains a Code of Conduct policy, accessible through our internal systems, which outlines expected employee conduct and the obligation to report any suspected violations of law or company policy. We do not tolerate retaliation against employees who raise concerns in good faith. As part of our commitment to ethical business practices, Earnix provides annual mandatory training on ethics and compliance to all employees. We plan to expand our training program to include additional modules on modern slavery for staff involved in the supplier approval process. These sessions will include practical instruction on identifying modern slavery risk indicators and promoting ethical sourcing practices.

6. Commitment to Continuous Improvement

We plan to incorporate training for people involved in the global procurement process to outline the importance of compliance with this legislation. We recognize that addressing modern slavery is a continual process and are committed to evolving our governance and supplier oversight accordingly.

This statement has been approved by the Board of Directors of Earnix UK Ltd on December 31, 2025 pursuant to section 54(1) of the Modern Slavery Act 2015

Signed:

A handwritten signature in black ink that reads 'Robin Gilthorpe'.

Robin Gilthorpe (Dec 29, 2025 15:45:58 GMT)

Name: Robin Gilthorpe

Director, Earnix UK Ltd