

# Compagnie Française d'Assurance pour le Commerce Extérieur – 'Coface'

## Modern Slavery & Human Trafficking Statement

Year ending 31<sup>st</sup> December 2024

### 1. Introduction

Coface is committed to operating ethically and with responsibility in all its businesses throughout the world. Our Values Charter sets out the framework, which guides our business operating principles and the behaviours of everyone who is part of Coface.

In compliance with Section 54 of the Modern Slavery Act 2015 and the latest guidance issued by the UK Government, this statement details the steps Coface has taken to prevent slavery and human trafficking within our operations and supply chains.

Responding to the latest UK Government guidance on reporting expectations, this statement marks the beginning of our commitment to exceed basic compliance requirements by integrating more advanced standards, with the goal to strengthen transparency and accountability in our ongoing efforts to combat modern slavery.

### 2. Organisation structure

Coface SA is a publicly traded company listed on the Euronext Paris Stock Exchange and is a global leader in credit insurance. Its primary operating subsidiary, Compagnie Française d'Assurance pour le Commerce Extérieur, facilitates Coface's international presence, spanning over 100 countries that includes the United Kingdom ('UK').

Coface in the UK provide companies with solutions designed to protect them against the risk of financial default by their debtors.

As a financial services company, Coface is authorised in France by the Autorité de Contrôle Prudentiel et de Résolution and authorised in the UK by the Prudential Regulation Authority.

Coface Branch, in the UK is subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority. Details about the extent of our regulation by the Prudential Regulation Authority are available from us on request.

### 3. Supply chains

Coface operates globally, sourcing a diverse range of goods and services through more than 1,000 suppliers.

In the UK, Coface engages with over 150 suppliers, primarily service providers registered in the country, though some have international operations and supply chains extending across multiple tiers.

While full visibility into the lowest tiers of certain supply chains may be limited, Coface applies a structured due diligence framework, as outlined in this document. Suppliers are segmented, assessed for risk, and categorised so Coface partners with entities that uphold legal and ethical standards.

Coface in the UK also has supplier relationships with other Coface entities worldwide, including Coface France, Coface Romania, and Coface India. All Coface entities operate under the same compliance policies and standards, ensuring consistency in governance and ethical sourcing across the organisation.

### 4. Policies in relation to slavery and human trafficking

The Coface Group has been committed to corporate, environmental and social issues for many years.

We signed up to the United Nations Global Compact in 2003, under which the Group within its sphere of influence supports the Compact's 10 guiding principles on human rights, international labour standards and anti-corruption initiatives.

Coface has been mapping non-financial risks since 2018 so that we can consolidate the Group's responsibility approach and embed it in our business activities.

Coface undertakes to promote and respect the protection of international human rights law in its sphere of influence and to ensure that it is never complicit in human rights violations.

We operate internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner, such as;

- Group corporate social responsibility: Coface's Corporate Social Responsibility (CSR) framework focuses on ethical business conduct, environmental sustainability, and social impact. It emphasises responsible risk management, compliance with regulatory standards, and fostering integrity across global operations, while also supporting community initiatives and sustainable development.
- Code of conduct: The Coface Code of Conduct is a comprehensive framework that outlines the ethical principles and expected behaviours for all employees, regardless of their role, when representing the organisation. It sets clear guidelines for integrity, accountability, and professionalism, ensuring compliance with legal and regulatory standards both in the UK and internationally. The Code of Conduct serves as a benchmark for decision-making and conduct, fostering a culture of transparency, respect, and responsible business practices throughout the organisation.

- Whistleblowing policy: Coface's Whistleblowing Policy establishes a secure and confidential mechanism for employees, customers, and business partners to report any concerns about unethical or unlawful behaviour, whether in the company's direct operations or across its supply chains. The policy provides multiple reporting channels, guarantees protection against retaliation, and sets clear procedures for prompt review and investigation, to promote and reinforce accountability and transparency throughout the organisation.
- Recruitment: Coface's recruitment practices guarantees a fair, merit-based process for both local and international candidates while adhering to legal and internal standards. The rigorous and unbiased evaluation framework explicitly commits to preventing modern slavery and human trafficking. Furthermore, the Board of Directors are responsible for ensuring that appropriate policies are in place to govern areas of the wider Coface business susceptible to human trafficking.

More information about Coface policies is available at [www.coface.com](http://www.coface.com) and [www.coface.uk](http://www.coface.uk).

## 5. Due diligence processes

Coface has established a comprehensive and regularly reviewed purchasing framework that defines the general conditions for procuring supplies and services. This framework outlines strict supplier consultation and selection criteria, ensuring ethical sourcing and compliance with regulatory standards.

All supplier contracts must include standardised contractual clauses and undergo a Know Your Supplier (KYS) due diligence process, which has a four eyes approach to assessing supplier relationships and categorises suppliers into the following risk levels:

- Low & Medium Risk Suppliers:  
Approved with oversight from a local procurement expert with access to the local compliance officer to discuss any matters found.
- High Risk Suppliers:  
Subject to review by the local compliance officer and final approval or rejection by the Regional or Group Compliance Officer.

To ensure continued compliance, Coface implements audit mechanisms and controls to verify adherence to KYS requirements.

For suppliers with an annual spend of £10,000 or more, Coface conducts a due diligence check to assess whether they implement measures to prevent modern slavery within their operations and supply chain. For UK-based suppliers that fall within the reporting scope, Coface also reviews their modern slavery statement, reinforcing its commitment to ethical sourcing and regulatory compliance.

Coface and its subsidiaries prioritise partnerships with qualified service providers that uphold the highest standards of integrity, operational efficiency, and data confidentiality while mitigating conflicts of interest.

## **6. Risk assessment and management**

Given the nature of our business, Coface assesses the risk of modern slavery and human trafficking within our operations and supply chain as low.

This is largely due to our supplier base, which predominantly consists of regulated service providers employing highly qualified personnel who receive regular training.

Nonetheless, Coface is committed to maintaining the highest ethical standards, ensuring our suppliers uphold principles of corporate social responsibility, transparency, and integrity across their operations.

## **7. Key performance indicators to measure effectiveness of steps being taken**

Supplier information is regularly reviewed through our Know Your Supplier process, with KPIs focused on identifying high-risk areas and tracking training participation.

As part of our Know Your Supplier (KYS) process, Coface regularly reviews supplier data to evaluate compliance, ethical standards, and modern slavery risks.

This framework provides structured oversight and has led to key performance indicators (KPIs) that focus on two primary areas:

- **Risk Assessment:** we identify and evaluate suppliers flagged as medium or high-risk based on many factors, including industry sector, geographic location, and regulatory exposure. This allows us to prioritise due diligence and take appropriate action where needed.
- **Employee Training:** Coface monitors participation rates in our Code of Conduct training, which underscores our commitment to only use suppliers who adhere to applicable legal requirements and our guidelines on financial crime, customer and data protection, labour standards, environmental responsibility, and health and safety. Additionally, we are transitioning from periodic modern slavery awareness training and communications to an annual certification process, ensuring that employees consistently recognise risk indicators and understand escalation procedures.

We will continue to assess these KPI metrics and if necessary, develop more KPIs to enhance transparency and accountability.

## 8. Training on modern slavery and trafficking

All new employees undergo comprehensive e-learning on company policies, ensuring a strong foundation in ethical business practices.

Periodic training sessions for existing employees reinforce our commitment to integrity and responsible decision-making.

These sessions cover key topics such as financial crime prevention, customer and data protection, ethical labour strategies, ethical supplier strategies, environmental sustainability, and health and safety.

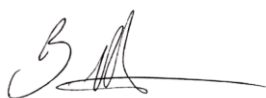
By fostering a culture of accountability, we empower employees to uphold the highest standards in both recruitment and supplier relationships.

In the UK, staff undergo periodic modern slavery training, covering areas such as:

- Identifying signs of slavery and human trafficking
- Initial response steps when concerns arise
- Escalation procedures within the organization
- External support options, including the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority

Coface are transitioning from periodic activities to an annual certification to reinforce cultural awareness and deepen understanding of modern slavery risks across the business.

Statement approved by the Management Board of Compagnie Française d'Assurance pour le Commerce Extérieur, UK branch, on 11<sup>th</sup> June 2025.



Benoit Urbin

Managing Director, UK and Ireland