Modern slavery statement

This statement on slavery and human trafficking is published for the 2022 financial year, pursuant to s54 of the Modern Slavery Act 2015 ('the Act').

CFC is committed to conducting our business responsibly and ethically, including ensuring that our supply chains are free from slavery and human trafficking.

1. OUR ORGANISATION STRUCTURE

CFC Group Limited is a private limited company registered in England and Wales under company number 13729209. This statement covers the activities of CFC Group Limited and its subsidiaries, including

- CFC Group Holdings Limited;
- CFC Underwriting Limited;
- CFC Corporate Member I Limited;
- CFC Security Limited;
- CFC Claims Limited;
- CFC Europe S.A;
- CFC USA Inc;
- CFC Security Inc; and
- CFC Security Pty Ltd

(collectively "CFC").

CFC is primarily involved in the provision of services as an underwriting agency and insurance intermediary, and the provision of cyber incident response services. CFC is headquartered in London, with licensed trading entities operating in Brussels, New York, Austin and Brisbane. CFC currently employees over 750 staff globally including contractors.

2. OUR SUPPLY CHAINS AND RISK ASSESSMENT

Whilst CFC sells its products and services worldwide, it 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 CFC'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.

3. 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:

Outsourcing Policy: setting out our approach to outsourcing, as well as the due diligence which must be undertaken before CFC outsources any aspect of its business to a third party. As part of the due diligence process, CFC checks all potential service providers for financial soundness, sanctions and adverse media, and continually monitors providers on a regular basis.

Whistleblowing Policy: setting out the manner in which our staff and business partners can report any concerns relating to the activities of any CFC 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 Policy: CFC's approach to effective risk management is outlined in its Risk Management Policy. Any existing or emerging modern slavery risks will be captured as part of the risk management cycle, with mitigants.

Code of Conduct Policy: outlining the ethical standards that all employees of CFC are expected to adhere to, to ensure CFC operates responsibly and ethically. These include ensuring employees act with integrity, due skill, care and diligence whilst displaying openness and transparency with all stakeholders including customers and suppliers.

4. NEXT STEPS

CFC 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.

During FY22, CFC reviewed its processes for managing supply chain ESG risks. This resulted in CFC's outsourcing and contracts policies to be updated to include:

- Additional ESG focused due diligence of prospective suppliers, on a risk sensitive basis, and,
- Additional legal risk management in the contractual negotiations with prospective suppliers.

CFC is currently piloting these processes with an intention to review and roll-out on a permanent basis during FY23.

Also during FY22, CFC enhanced its whistleblowing initiatives by including additional options and tools to ensure employees feel both comfortable and confident in raising and speaking up about any issues in the workplace. In addition to introducing further anonymous reporting services for employees to raise issues, CFC reinforced its speak up culture with an improved policy and further appointed a female non-executive director as an additional whistleblowing champion.

We intend to take the following steps during the 2023 financial year:

- CFC is in the process of implementing enhanced ESG due diligence for its prospective suppliers, as detailed above. CFC intends to review the pilot results and make any necessary updates prior to permanently embedding the diligence requirements into its policies and procedures.

5. ANNUAL REVIEW

The statement has been approved by the ESG Committee on behalf of the Board.

David Walsh
Group Chief Executive Officer
4 May 2023