

Modern slavery statement

This statement on slavery and human trafficking is published for the 2023 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 Bidco 2022 Limited;
- CFC Bidco 2017 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 entities operating in the United Kingdom, United States, European Union and Australia. CFC currently employs over 850 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.

ESG Policy: setting out CFC's approach to environmental, social and governance matters.

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.

Following the pilot in FY23, CFC has now permanently implemented an enhanced ESG due diligence process for its prospective suppliers on a risk-sensitive basis to ensure it takes the necessary steps to prevent modern slavery from occurring in its supply chain. CFC has also introduced additional vendor due diligence steps in the legal contractual negotiations with prospective suppliers.

CFC has recently become accredited as a Living Wage Employer by the Living Wage Foundation in the United Kingdom, and is committed to being a responsible employer and ensuring that its employees, contractors, and sub-contractors are fairly remunerated.

5. ANNUAL REVIEW

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

Louise O'Shea
Group Chief Executive Officer
10 July 2024