



# Modern slavery statement

This statement on slavery and human trafficking is published for the 2025 financial year, pursuant to s54 of the Modern Slavery Act 2015 (the "Act").

CFC is committed to conducting its business responsibly and ethically, including ensuring that its supply chains are free from slavery and human trafficking. This statement highlights the key activities that CFC has undertaken during the financial year to mitigate the risk of modern slavery activities within CFC and its supply chain.

## 1. OUR ORGANISATION STRUCTURE

CFC Group Limited is a privately owned business primarily involved in the provision of services as an underwriting agency and insurance intermediary, and the provision of cyber incident response services. The CFC group is headquartered in London, United Kingdom with subsidiaries in the United States, European Union, Australia and Canada. The CFC group currently employs over 1000 employees globally, including contractors. This statement is made on behalf of CFC Group Limited and its UK subsidiaries (together "CFC" or "CFC UK Group") – details of which can be found in CFC Group Limited's latest audited financial accounts, available at Companies House.

## 2. OUR SUPPLY CHAINS AND RISK ASSESSMENT

Whilst CFC sells its products and provides services worldwide, it does not typically make use of supply chains which are traditionally susceptible to an enhanced risk of slavery or human trafficking, such as business sectors which are reliant on a high degree of human labour.

CFC maintains records of all its suppliers which undergo a due diligence process before onboarding, as detailed below. CFC remains vigilant to the potential risk of modern slavery in its supply chain and has in place policies and procedures (as detailed below) to mitigate the risk of CFC unknowingly doing business with a company involved in any form of modern slavery or human trafficking.

CFC is accredited as a Living Wage Employer by the Living Wage Foundation in the United Kingdom and is committed to being a responsible employer.

## 3. OUR POLICIES AND PROCEDURES

CFC carries out appropriate due diligence on its suppliers, including, where reasonable, requiring suppliers to confirm that they have ESG policies in place (including in respect of Modern Slavery) and, for new suppliers identified as being higher risk, requiring suppliers to complete enhanced due diligence. Background checks of such suppliers are performed using third party providers and, for higher risk suppliers, appropriate contractual protections are included within supplier contracts where practicable.

As part of CFC's commitment to ensuring there is no modern slavery or human trafficking in its supply chains or in any part of its business, CFC maintains the following internal policies and procedures:

**Procurement and Contracts Policy:** sets out CFC's approach to outsourcing, as well as any 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 and sanctions.

**Whistleblowing Policy:** sets out the manner in which CFC employees and contractors can report confidentially any concerns relating to suspected illegal or unethical activities.



**Grievance Policy:** sets out the mechanisms which all CFC employees have access to in the event that any employee feels unhappy in the way they are treated within the workplace or any other issues involving an employee's employment at CFC. Such mechanisms include, but are not limited to, access to Safecall, an independent, confidential reporting service and processes set out in the Whistleblowing Policy.

**Financial Crime Prevention Policy:** outlines the minimum standards set by CFC to proactively detect, prevent and deter financial crime, and the responsibilities of CFC colleagues and the business in implementing suitable mitigating or management systems and controls.

**Remuneration Policy:** sets out the principles for fixed and variable employee remuneration and ensures transparency to our remuneration approach and practices including benefits offered to all employees.

**Code of Conduct Policy:** outlines 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.

**Sustainability Policy:** sets out CFC's approach to environmental, social and governance (ESG) matters.

CFC sets the tone from the top and ultimately the CFC Group Limited board, together with senior management, are responsible for ensuring effective systems and controls are in place to identify any circumstances in CFC's supply chains which may give rise to a risk of slavery and human trafficking.

Our policies are available on CFC's intranet to all employees within the CFC UK Group.

#### 4. CONTINUOUS IMPROVEMENT

CFC regularly 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.

In 2026, CFC expects to implement a new automated, centralized third-party risk management tool which will support the oversight of modern slavery risks within CFC's supply chain.

#### 5. ANNUAL REVIEW

The statement has been approved by the Board of CFC Group Limited and signed on its behalf.

Signed by:  
  
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Louise O'Shea  
Group Chief Executive Officer  
21 May 2026