

Modern Slavery and Human Trafficking Statement

Introduction

This statement applies to RFIB Group Limited (RFIB) and it includes all RFIB's direct and indirect subsidiaries (including non-obligated entities around the world).

Our Organisation

RFIB (part of the Risk Transfer Group) is an independent international insurance and reinsurance broker registered in the United Kingdom and has several offices worldwide. RFIB has a long-standing reputation for conducting business with honesty, integrity and in accordance with its Code of Conduct.

RFIB employs over 200 people majority of whom are based in the United Kingdom and we transact business and have customers worldwide.

As an insurance intermediary, RFIB does not operate in a sector where modern slavery is prevalent and have not identified any Modern Slavery concerns. However, we remain committed to ensuring that we maintain strong and relevant policies and procedures for our staff, contractors, and suppliers.

Our Supply Chain

RFIB fully supports the UK Modern Slavery Act 2015 and are committed to conducting business in a responsible way through maintaining and improving our global policies to identify and eliminate any human rights violation in our business and supply chains.

Our supply chains are predominately our counterparties involved in the provision of insurance services, such as insurance companies, intermediaries, contractors, and service providers (such as consultants, loss adjusters and lawyers) necessary to run our business effectively.

RFIB screen all known parties in the business placement chain, on an ongoing basis and any other parties who might be the recipient of a claim. We also have a robust due diligence process in the tendering process of outsource suppliers.

Our Policies

RFIB has an Anti-Slavery and Human Trafficking Policy which outlines our Group process to ensure we deliver on our objective to minimise the risk of modern slavery in our supply chain. Other relevant policies include:

- **Global Recruitment Selection Policy** which sets the best practice framework for the recruitment and selection of our staff and the expectation for all our offices to ensure compliance with RFIB's slavery and human trafficking statement
- **Conduct Policy** which sets the principles for the conduct of all staff as we strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain
- **Financial Crime Policy** which details RFIB's approach to mitigating the risk of finance crime within the business which includes its commitment to comply with relevant local and international laws and acting with integrity and in an honest, professional manner.
- **Whistleblowing Policy** which encourages staff to report any concerns including any relating to modern slavery, human trafficking and child or forced labour.

Due Diligence

As part of our due diligence process, we continue to monitor all our counterparties – specifically those operating in high risk territories and we require agreement that our suppliers are not involved in the breach of any law against slavery and human trafficking.

Through our Term of Business Agreements, we also require that our suppliers maintain their own policies and procedures, specifically to prevent slavery and human trafficking offences and that this is enforced where applicable.

Training

To help embed the principals set out above, RFIB provides online training to staff which includes conduct risk, whistleblowing and financial crime. Our policies are shared to all staff and incorporated into the induction training. It includes information on who staff should contact if they have any concerns.

Next steps

RFIB will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers by

- assessing which activities or countries are high risk in relation to slavery or human trafficking and will develop an action plan and instigate anti-slavery initiatives on a phased basis;
- reviewing our policies to ensure the issues of slavery and human trafficking are adequately addressed; and
- provide specific training on slavery and human trafficking to employees, as appropriate.

Approval

This statement covers 1st January to 31st December 2019 and has been approved by the Board. It will be reviewed and updated annually.