

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).

The Organisation

RFIB (part of the Integro Group) is an independent international insurance and reinsurance intermediary 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, the majority of whom are based in the United Kingdom and it transacts business and has customers worldwide.

As an insurance intermediary, RFIB does not operate in a sector where modern slavery is prevalent and has not identified any Modern Slavery concerns. However, RFIB remains committed to ensuring that it maintains strong and relevant policies and procedures for its staff, contractors, and suppliers.

The business supply chain

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

The business supply chain predominately consists of 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 counterparties 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 a number of policies in place and updated at least annually, to ensure it delivers on its objective to minimise the risk of modern slavery in its supply chain, these 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 Modern Slavery and Human Trafficking Statement.
- **Conduct Policy** which sets the principles for the conduct of all staff as RFIB strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and in the management of its supply chain.
- **Counterparty Policy** which details the due diligence process undertaken when onboarding new Counterparties and on an ongoing basis.
- **Financial Crime Policy** which details RFIB's approach to mitigating the risk of financial crime within the business and its supply chain, this includes its commitment to comply with relevant local and international laws.
- **Whistleblowing Policy** which encourages staff to report any concerns, including any relating to modern slavery, human trafficking and child or forced labour.

Due Diligence

RFIB conducts robust due diligence on its Counterparties, including their Directors and Officers and enter into an agreement (Term of Business Agreements, 'TOBA') that states there to be no involvement in the breach of any law against slavery and human trafficking.

Through the TOBAs, RFIB also requires that its suppliers maintain their own policies and procedures, specifically to prevent slavery and human trafficking offences and that this is enforced where applicable.

Risk Management

All Group Policies and processes are conducted to manage the risks identified in our business model. RFIB operate a 3 lines of defence model of internal control and this is assessed annually for effectiveness.

Training

To help embed the principals in place and as set out in this statement, RFIB provides online training to staff which includes conduct risk, whistleblowing and financial crime. RFIB policies are shared with all staff, highlighted via ongoing communication and incorporated into the induction training for new staff.

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 2020 and has been approved by the Board on 24th December 2019. It will be reviewed and updated annually.