

Our Commitment

The CFC Group (“Group”) believes that everyone deserves the right to freedom and liberty, and that modern slavery and other forms of abuse are direct violations of basic human rights and the law.

This policy supports our People Policy, providing the basis for ensuring that the goods and services we purchase through our supply ecosystems are ethical and eliminate modern slavery risk. It supports the CFC Group Code of Conduct by providing guidance on modern slavery compliance for our people and lays out requirements for our suppliers.

This policy applies to everyone working for the Group or on its behalf including employees, contractors, subcontractors and suppliers.

Our Approach

The Group will achieve our commitment by:

- ▶ Complying with applicable modern slavery legislation.
- ▶ Implementing fit-for-purpose modern slavery processes to implement the intent of this policy.
- ▶ Documenting procurement processes and key purchasing decisions.
- ▶ Never employing children under the legal age of employment in any country or local jurisdiction.
- ▶ Never using any form of forced, bonded or involuntary labour.
- ▶ Complying with relevant legislation and mandatory industry standards regarding working hours, overtime, wages and benefits.
- ▶ Maintaining high standards of workplace health and safety.
- ▶ Escalating to suppliers or customers where their work practices are not complying with relevant modern slavery legislation.
- ▶ Encouraging and enabling everyone to raise concerns about the application of this policy.
- ▶ Managing any identified breaches of this policy through the Group Code of Conduct.

Responsibility

All Group employees are expected to read, understand, raise any concerns and adhere to this policy and related supporting documents. Group employees are responsible for ensuring that this Modern Slavery policy is understood and applied across all contractors, subcontractors and suppliers. The Executive team are accountable for ensuring this policy is implemented.

The Group Board has ultimate responsibility for ensuring this policy meets the minimum baseline obligations for each organisation within the Group, is aligned with the Group’s Values and is implemented by management.

This policy has been approved by the Group Board and will be reviewed biennially.



Philip Cardaci
Group Executive Chairman

12. October 2023