

15 March 2023

*Modern Slavery Act 2015: slavery and human trafficking statement*

**I. Introduction**

We, Fusion Risk Management UK, Ltd., are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. We are committed to ensuring there is no slavery or human trafficking in any part of our business and we will seek to ensure that our partners are equally committed to this cause.

**II. Our policies on slavery and human trafficking**

**a. Scope**

We have appropriate procedures and policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

**b. Definitions**

Fusion recognizes the United Nations Global Compact's ("UNGC") Ten Principles which are based on The Universal Declaration of Human Rights. The UNGC specific Ten Principles are:

1. Support and respect the protection of internationally proclaimed human rights.
2. Ensure the company is not complicit in human rights abuses.
3. Uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Uphold the elimination of all forms of forced and compulsory labour.
5. Uphold the effective abolition of child labour.
6. Eliminate discrimination in employment and occupation.
7. Support a precautionary approach to environmental challenges.
8. Undertake initiatives to promote greater environmental responsibility.
9. Encourage the development and diffusion of environmentally friendly technologies.
10. Work against corruption in all its forms, including extortion and bribery.

Under the UNGC, Human rights are the same as labour rights; human trafficking and slavery assessments adopt UNGC assessment approach and definitions.

**Supply Chain:** Entities with which the enterprise has a direct or indirect business relationship and which either (a) supply products or services that contribute to the enterprise's own products or services or (b) receive products or services from the enterprise.

**Due Diligence:** Due diligence in the context of human rights comprises an ongoing management process designed to support the organization in meeting its responsibility to human rights. A human rights due diligence process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating how impacts are addressed.

**Human Rights Risk:** Any risks that a business's operations may lead to one or more adverse human rights impacts.

**Adverse Human Rights Impact:** An adverse impact occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights. A human rights impact may be actual or potential. Adverse impacts may be caused by an enterprise through its own activities; may be contributed to by an enterprise either directly or indirectly through an outside entity or may be caused by someone with whom the entity does business and is linked to the entities own operations, products or services.

**Worker:** Workers include direct employees, temporary workers, migrant workers, student workers, contract workers, and any other person(s) providing labour and employment services to entities in the supply chain.

### **c. Policy**

While Fusion's services are sold globally, its supply chain and engagement with suppliers is extremely narrow. Nevertheless, Fusion focuses its efforts to comply with these rules. We expect our suppliers not to be involved in forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons of any age at any tier of the supply chain. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. Suppliers, as employers or agents, may not hold or destroy employees' identification or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law.

Employers may not restrict workers' freedom of movement in the facility or entering or exiting company-provided facilities. All work must be voluntary and workers shall be free to terminate their employment and leave work at any time. Employers and agents may not use misleading or fraudulent practices during the recruitment of employees.

As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment and the hazardous nature of the work, prior to the worker departing from his or her country of origin. Workers must not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.

We expect our suppliers to have a compliance plan in place to ensure that human trafficking and forced labour are not used and that risks of worker exploitation are mitigated. We will continue to promote and encourage our suppliers to take steps to ensure that slavery and human trafficking is not taking place in any part of our supply chain or in any part of their businesses. We expect our suppliers to conduct due diligence on their respective supply chains and to assist us with our compliance with these rules.

To the extent that a supplier refuses to cooperate with our compliance efforts, we may reconsider our supply arrangement and implement remedies available to us.

### **III. Organisation's structure**

We are an operational resilience – encompassing business continuity, risk management, IT risk, and crisis and incident management. We are a part of the Fusion Risk Management Group (Group), and our ultimate parent company is Fusion Risk Management, Inc. Fusion Risk Management, Inc. has its head office in the USA. The Group has over 300 employees worldwide and operates in the United Kingdom and the USA and provides its services to customers across the globe.

### **IV. Our business**

Our business is organised into nine business units:

- Finance
- General & Executive Management
- Human Resources
- Marketing
- Office of CTO
- Product Management
- Professional Services
- Resilience Innovation Office
- Revenue Office

### **V. Our supply chains**

Our supply chains comprises a single point of production for online services (e.g., cloud-based Software as a Service, such as Salesforce etc.) with no tiering. Fusion also conducts reviews of vendors and rates them according to a tiering system through its vendor management process.

## **VI. Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have the following systems in place:

- Identifying and assessing potential risk areas in our supply chains.
- Mitigating the risk of slavery and human trafficking occurring in our supply chains.
- Monitoring potential risk areas in our supply chains.
- Maintaining a non-retaliatory mechanism for reporting any concerns related to this policy.

Please report any concerns or queries related to this policy to [compliance@fusionrm.com](mailto:compliance@fusionrm.com).

## **VII. Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- A Third Party Vendor Management Programme
- A Third Party Vendor questionnaire with a portion dedicated to compliance with the Modern Slavery Act in their business and supply chain
- Requiring our vendors certify their compliance with this Modern Slavery Act Statement

We have a dedicated compliance team, which consists of representatives from the following departments:

- Legal
- Risk / Third Party Vendor Management
- Human Resources

## **VIII. Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide mandatory Modern Slavery training to our staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2022. It was approved by the board on 06 March 2023.

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*Michael H Campbell*  
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Michael Campbell, Director and CEO  
Fusion Risk Management UK, Ltd.

Date: 15 March 2023