

Anti-slavery and human trafficking statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the anti-slavery and human trafficking statement of The Fidelis Partnership Group (“**Fidelis**”) for the financial year ending 31 December 2025 (the “**Statement**”). This Statement was approved by the Board of Directors of TFP Group Limited, the parent company of Fidelis on 25 February 2026.

OUR COMMITMENT

Fidelis has zero tolerance to inaction against modern slavery and human trafficking (“**Modern Slavery**”) and is committed to preventing Modern Slavery in its corporate activities and to ensuring that its supply chains are free from Modern Slavery.

This Statement contains Fidelis’ vision and commitment to be a responsible organisation in the (re)insurance sector to combat Modern Slavery. We have operational procedures to ensure that our values and ethics are integrated into our operations, including, but not limited to, our underwriting process, to prevent Modern Slavery.

OUR STRUCTURE

TFP Group Limited is the holding company of Fidelis which provides insurance and reinsurance intermediary services on a global basis. TFP Group Limited was incorporated in 2022 and began trading on 3 January 2023. The companies within Fidelis are either regulated (re)insurance intermediaries, service companies, or serve a purpose ancillary to its principal (re)insurance intermediation activities. TFP Group Limited has its registered office in Bermuda. There are 569 employees across Fidelis which operates in Bermuda, the Republic of Ireland, the United Arab Emirates, Australia, Portugal, the U.S. and the U.K as at 31 December 2025.

This Statement covers the activities of the following Fidelis entities:

- TFP Group Limited
- Fidelis Marketing Limited;
- Shelf Opco Bermuda Limited;
- Fidelis Opco Limited;
- Pine Walk Capital Limited;
- Pine Walk Europe Limited; and
- All of the entities operating on our MGA platform¹.

OUR BUSINESS AND SUPPLY CHAINS

¹ Radius Specialty Limited, Oakside Surety Limited, Tiomanta Specialty Limited, Perigon Product Recall Limited, Navium Marine Limited, Openenergy Limited, Pernix Specialty Limited, Itasca MGA Limited, Novagen Specialty Limited, Silverflame Re Limited, Sevanta Specialty Liability Limited, Corsiam Specialty Limited, Arenite Specialty Limited, Carnovis Specialty Limited, Imala Re LLC, Seraphina Specialty Limited and any of their services companies, overseas branches and holding companies.

Our business model

Fidelis provides intermediary services to (re)insurers and it engages with brokers on behalf of (re)insurers on a global basis.

Labour supply chain

Fidelis recognises that robust processes can reduce the risk of forced labour in our labour supply chain. We therefore work exclusively with reputable recruitment agencies to ensure they meet our ethical standards and comply with all relevant employment legislation. As part of our recruitment process, all prospective employees are subject to comprehensive background checks and right to work verification before commencing employment with Fidelis.

OUR POLICIES

This Statement is the principal articulation of Fidelis' policy on Modern Slavery and is intended to inform and influence all the operational procedures within the Group. In order to identify and mitigate potential risk areas, including risk of Modern Slavery in our supply chains, we operate a range of policies and procedures, including the following:

- Procurement Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Financial Crime Policy
- Outsourcing Policy
- Sanctions Policy
- Legal Contracts Referral Policy

ASSESSING AND MANAGING RISKS

Underwriting

The Boards of Fidelis consider that the risk of it or its supply chains being involved in or complicit in Modern Slavery is very low as Fidelis does not manufacture goods or maintain complex physical supply chains. Fidelis is not involved in the activities of producing or manufacturing goods which typically involve supply chains which can be susceptible to this risk.

There is a risk, however, insurance intermediaries can become involved or complicit in Modern Slavery by offering financial protection against potential losses which form a part of the supply chain of their clients. To mitigate this risk, Fidelis has championed the use of the contractual provision set out below for a number of years, and Fidelis is regarded as the leading advocate of this approach in the London market, having been the prime mover in authoring the wording now in use. Since Fidelis began trading in January 2023, we have included the following forced labour clause (the "**Clause**") in all marine cargo business as our default policy wording. In 2025, 69% (2024: 67%) of the overall marine cargo policies adopted the Clause. The Clause operates as a reminder to the insureds of their legal duties in respect of forced or child labour:

“It is hereby understood and agreed that the Insured shall exercise best efforts to be compliant with all applicable legal and regulatory obligations that the Insured should be aware of in their country of domicile, [relating to the cargo insured,]²in respect of forced and/or child labour.”

During 2025, we calibrated our underwriting system to flag any insurance cover involving high-risk occupancy for consideration of the Clause. Fidelis underwriters in other lines of business have also incorporated the Clause when providing cover for high-risk industries in countries with a known vulnerability to forced labour – for instance, garments, mining or commodities such as cocoa and sugar, and in certain Direct and Facultative Property contracts where relevant.

In addition to the use of the Clause in our day-to-day underwriting, Fidelis’ standard underwriting process requires that agreed social and environmental standards are upheld – this includes topics related to human rights and forced labour. Checks are performed by the Fidelis’ Sustainability function where relevant, and if Fidelis is not satisfied that its standards are met, we will not underwrite the risk on behalf of the (re)insurers. This further embeds due diligence on forced labour topics within our underwriting.

In 2026, Fidelis remains committed to continue promoting the use of the Clause to increase engagement on the subject and ensure appropriate due diligence is undertaken on prospective clients and their businesses. Fidelis also conducts periodic reviews to identify further lines of business where the Clause may be applied. In addition, Fidelis continues to engage in wider discussions on how best to drive change across the insurance sector.

Operations

Fidelis procures services from third party providers in areas including cleaning, office maintenance, IT support, IT software development and claims handling.

Since the establishment of the Procurement function in September 2023, we have formalised our vendor selection criteria for new suppliers of IT and other key contracts to establish their ESG/Anti-Slavery credentials.

We also include anti Modern Slavery provisions in all our appropriate supplier contracts to ensure that compliance with anti-Modern Slavery law is embedded in our supplier relationships.

DUE DILIGENCE PROCESS

In combating Modern Slavery, Fidelis recognises the role that due diligence can play in eliminating unsuitable third parties from its business. Prior to writing any cargo risks, entering into material contracts, or engaging higher risk service providers, we conduct due diligence on new counterparties assessing the potential risks of inadvertently supporting Modern Slavery within our business and supply chain.

Since 2025, Fidelis has put in place a new third-party risk and contract management system to further strengthen our due diligence, contract management, and re-assessment of suppliers’ processes. The system enables us to actively manage, monitor and periodically reassess all third-party suppliers throughout the service lifecycle. This process ensures effective oversight, supports compliance with regulatory obligations, and enables us to identify and respond to any changes that may increase the supplier's risk profile.

² The Clause may be amended to adapt to the applicable lines of business.

TRAINING

To raise awareness and ensure an understanding of the risks of Modern Slavery in supply chains, all employees of Fidelis are required to complete a mandatory training course on this topic . The training materials are tailored to reflect the risks of Modern Slavery in the (re)insurance sector, making it relevant to our business activities.

As at the date of this Statement, 66% of our full-time employees have completed this training. In 2026, we will continue to provide Modern Slavery training to all employees.

MONITORING AND EVALUATION

By describing its clear policy in this Statement and by ensuring its employees' awareness of Modern Slavery, Fidelis is able to effectively mitigate against the risk of Modern Slavery within the context of its limited supply chain. In addition, when engaging suppliers, the application of our Procurement Policy is effective in placing a contractual obligation on Fidelis' key counterparties.

The continued effort in promoting the use of the Clause has successfully raised awareness of Modern Slavery among brokers and the insureds. For 2026 Fidelis will continue its efforts and expand the application of the Clause in high-risk industries.

Richard Brindle, Chairman and Group Chief Executive Officer

Date: 25 February 2026