



London Forfeiting Company Group Modern Slavery and Human Trafficking Statement 2026

1. Introduction and purpose

London Forfaiting Company Group (“LFC” or “the Group”) is committed to conducting business responsibly, ethically and in a manner that respects internationally recognised human rights. This statement sets out the steps taken by LFC to prevent modern slavery and human trafficking in its own operations, supply chain and business relationships.

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. LFC recognises that these risks can arise across global business activity, including through suppliers, clients, counterparties, outsourced service providers and other third-party relationships.

This statement is intended to support compliance with section 54 of the Modern Slavery Act 2015 and reflects LFC’s commitment to continuous improvement in the identification, assessment and management of modern slavery risk.

2. Scope of this statement

This statement applies to LFC’s direct operations, employees, officers, suppliers, service providers, agents, clients and counterparties, to the extent relevant to LFC’s business activities. It also applies to those subsidiaries and business relationships over which LFC has oversight or influence. Where LFC operates through a wider group structure, the statement should be read alongside applicable group policies and local legal requirements.

3. Our structure and business

LFC was established in 1984 and specialises in the arrangement and provision of forfaiting and other trade-related finance products. LFC provides non-recourse and trade finance solutions to importers, exporters, banks and corporate clients. Given the international nature of trade finance, LFC may be exposed to modern slavery risk through cross-border transactions, counterparties, supply chains and jurisdictions where labour standards, enforcement and transparency vary.

4. Governance and accountability

Responsibility for the oversight of modern slavery risk sits with senior management, with appropriate escalation to the Board where material issues are identified. Relevant control functions and business teams are responsible for applying the policies, procedures and due diligence controls that support this statement.

This statement is reviewed periodically and updated where necessary to reflect changes in LFC’s business model, risk profile, regulatory expectations and control environment. Senior management is responsible for ensuring that modern slavery considerations remain embedded in relevant policies and operational processes.

- employment standards, recruitment practices, equal treatment, workplace conduct and grievance arrangements;
- financial crime, sanctions, anti-bribery and corruption, client due diligence, supplier management, whistleblowing and speak-up procedures.

5. Policies and standards

LFC's commitment to preventing modern slavery is supported by policies and procedures designed to promote lawful, ethical and responsible conduct. These include policies relating to employment, conduct, financial crime, sanctions, anti-bribery and corruption, whistleblowing, outsourcing, supplier management and client due diligence.

LFC also takes into account internationally recognised human rights standards, including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

6. Risk assessment

LFC recognises that modern slavery risk may be heightened in certain countries, sectors, products, transaction structures and third-party relationships. As a trade finance business with international counterparties, LFC pays particular attention to risk indicators connected with emerging markets, complex supply chains, labour-intensive industries, weak governance environments and counterparties operating through multiple intermediaries.

Risk assessment is considered across three main areas: LFC's own workforce and working environment; suppliers and outsourced service providers; and clients, counterparties and transactions. This separation helps ensure that controls are proportionate to the nature and source of the risk.

7. Due diligence and controls

LFC applies a risk-based due diligence approach to clients, counterparties, suppliers and other third parties. This may include screening, know-your-customer checks, sanctions and adverse media searches, assessment of ownership and control, review of business activity, consideration of country and sector risk, and escalation where modern slavery or human rights concerns are identified. Where higher-risk indicators are present, LFC may require additional information, enhanced due diligence, senior management approval, contractual protections, ongoing monitoring or, where appropriate, refusal or termination of a relationship. Relevant red flags include evidence of forced labour, exploitation, poor labour practices, opaque supply chains, adverse media, high-risk jurisdictions, unusual transaction structures or unwillingness to provide transparency.

8. Training and awareness

LFC provides training and awareness to relevant employees so that they understand modern slavery risk, recognise warning signs and know how to escalate concerns. Training is prioritised for employees involved in client onboarding, transaction review, supplier management, compliance, operations and other roles where modern slavery risk may be identified.

LFC's Code of Conduct and related policies reinforce the expectation that employees act with integrity, treat others fairly and report concerns promptly. Employees are expected to apply professional judgement and seek guidance where a client, supplier, transaction or business relationship presents potential human rights concerns.

9. Reporting concerns and whistleblowing

LFC encourages openness and the prompt reporting of concerns. Employees and relevant stakeholders may raise concerns through established reporting and whistleblowing channels. Reports are treated seriously, handled confidentially where appropriate, and escalated in line with internal procedures. LFC does not tolerate retaliation against anyone who raises a concern in good faith.

10. Monitoring effectiveness

LFC monitors the effectiveness of its approach through a combination of due diligence outcomes, escalation records, training completion, supplier and counterparty reviews, whistleblowing reports, policy reviews and management oversight. These indicators help LFC assess whether its controls remain proportionate and whether further improvements are required.

Where weaknesses or emerging risks are identified, LFC will consider appropriate remedial actions, including policy updates, additional training, enhanced due diligence, changes to supplier or counterparty arrangements and escalation to senior management or the Board.

11. Continuous improvement and approval

LFC remains committed to improving its approach to preventing modern slavery and human trafficking. The Group will continue to review its policies, controls, training and due diligence arrangements to ensure they remain appropriate to the nature, scale and complexity of its business. This statement has been approved by the Board and is made on behalf of London Forfaiting Company Group.

Simon Lay
Director
Date: 30 June 2026

William Ramzan
Company Secretary