

FAIRFAX FINANCIAL HOLDINGS LIMITED

MODERN SLAVERY POLICY

Approved by the Board of Directors on February 15, 2024

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For more than 30 years, the Guiding Principles of Fairfax have been the foundation of our business and culture. The Guiding Principles include our core value that “honesty and integrity are essential in all our relationships and will never be comprised.” As stated in the Code of Business Conduct and Ethics, this means that competitive advantage or profit must not be sought through unlawful, dishonest, or unethical business practices. Accordingly, Fairfax expects legal and ethical business practices, regardless of any impact on the bottom line.

It is in this spirit that the Board of Directors of Fairfax Financial Holdings Limited (“**Fairfax**”) has adopted this Modern Slavery Policy (the “**Policy**”) to provide concrete guidance regarding compliance with relevant child labour, forced labour and related laws, including Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) and Fairfax’s commitment more generally to avoid any form of child labour, forced labour, modern slavery or human trafficking within its operations or its supply chains. As a matter of law and corporate policy, we always act with integrity and we do not use child labour or forced labour in our operations or source goods made with child labour or forced labour.

Application

1. This Policy applies to all directors, officers, and employees of Fairfax and of every subsidiary of Fairfax. Fairfax and its subsidiaries are referred to collectively as “Fairfax” and each director, officer and employee of Fairfax and its subsidiaries is referred to as a “Covered Person.” All Covered Persons, wherever located, will adhere to the letter and spirit of all applicable Modern Slavery laws in all countries in which Fairfax operates. Fairfax will attempt to ensure that this Policy is brought to the attention of all Covered Persons.
2. This Policy sets forth a baseline standard that applies to all subsidiaries of Fairfax. Each individual subsidiary may implement modern slavery guidance that is more restrictive than this Policy, but no subsidiary may implement guidance that is less restrictive. To the extent that there is any conflict between this Policy and a separate policy implemented by a subsidiary, the more restrictive of the two policies will govern as to the directors, officers, and employees of that subsidiary.

Compliance with this Policy

3. This Policy sets out Fairfax’s minimum commitments in respect of child labour and forced labour. Because no policy can anticipate every possible situation or business practice, when in doubt, each Covered Person should discuss the situation with supervisors or seek the guidance of Fairfax’s General Counsel (the “**General Counsel**”) until he or she is satisfied that all the relevant facts are known and have been considered and that the course of action chosen is consistent with this Policy.

4. Violations of this Policy may result in disciplinary action, up to and including potential termination of employment, depending on the particular circumstances. Appropriate disciplinary action will also be taken against Covered Persons who authorize, condone, or negligently fail to prevent violations of this Policy. Retaliation against those who refuse to violate this Policy or who in good faith report suspected violations of this Policy will not be tolerated.

Prohibition on Forced Labour

5. Fairfax strictly prohibits and will not tolerate any form of Modern Slavery in its operations or supply chains.
6. “**Modern Slavery**” includes:
 - a. **Slavery** – The behaviour on the part of the offender as if they owned the victim, depriving the victim of their freedom.
 - b. **Forced or compulsory labour** – Work or service of a victim which involves coercion, either direct threats or violence or more subtle forms of compulsion. Work or service is extracted from the victim under the threat of penalty and for which the victim has not offered themselves voluntarily.
 - c. **Child labour** – The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that: (a) is mentally, physically, socially or morally dangerous and harmful to children; and/or (b) interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.
 - d. **Human trafficking** – Arrangements for the travel of the victim with a view to them being exploited. Human trafficking often occurs in facilitation of slavery, forced or compulsory labour, or child labour.
7. You should notify your supervisor as soon as possible if you have any concerns, issues or suspicions about Modern Slavery in any parts of Fairfax’s business or its supply chains.
8. Fairfax aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Fairfax is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of Fairfax’s business or its supply chains.

Mitigation of Business and Supply Chain Risk

9. Fairfax must have in place processes and/or procedures designed to minimize the risk of Modern Slavery in its business or its supply chains, including with respect to dealings with vendors.

10. Fairfax will implement measures to ensure that its' subsidiaries continue to minimize the risk of Modern Slavery in their operations, including, without limitation, requiring the completion of questionnaires and certifications.
11. Fairfax expects that subsidiaries will train employees in respect of Modern Slavery issues and preventive measures as appropriate.

Investments

12. Our Due Diligence Protocol supports our investment teams in identifying material ESG factors when conducting due diligence on potential investments, including, where applicable, those relevant to Modern Slavery.
13. All material investments made by Fairfax must be approved by the Investment Committee. To facilitate this, investment teams will provide the Investment Committee, which includes our Chairman & CEO, with a detailed memorandum outlining the merits of the transaction and material risks, including, where applicable, those related to human rights and modern slavery where these are raised as part of investment due diligence. The Investment Committee reports directly to Fairfax's Board of Directors. Fairfax's investment team is required to conduct our investment business with a focus on social and economic development within the countries in which Fairfax invests. Deficiencies or excessive environmental, social or governance risks will result in the reject of investment opportunities or the sale of existing positions. With any investment, good governance and the honesty and integrity of management is fundamental and will never be compromised for short-term gains or benefits.

Seeking Guidance

14. If you have any questions or concerns about this Policy or about compliance with any Modern Slavery laws, it is your obligation to contact your supervisor or the General Counsel to resolve those questions or concerns.

Reporting Concerns and Cooperating with Investigations

15. It is the obligation of every Covered Person to report any known or suspected violations of this Policy and to cooperate with any investigations that arise therefrom. Reports should be made to:
 - a. the Covered Person's supervisor (unless the supervisor may be suspected of wrongdoing),
 - b. their immediate supervisor's manager,
 - c. the General Counsel at generalcounsel@fairfax.ca or 416-367-4941, including in a situation where the Covered Person is not satisfied with the actions taken by his or her supervisor or supervisor's manager, and/or

- d. on a confidential and anonymous basis to the Audit Committee of Fairfax by telephone (toll free in North America: 1-888-444-1196 or outside North America: 1-416-642-2613).
- 16. Supervisors who receive reports of known or suspected violations of this Policy must contact the General Counsel at generalcounsel@fairfax.ca or 416-367-4941 to report the concern, as well as any follow-up action taken in response thereto.
- 17. Fairfax will treat all reports seriously and will investigate them as appropriate. It is the obligation of each Covered Person to cooperate in these investigations.

Non-Retaliation

- 18. Fairfax does not tolerate retaliation against anyone who has refused to violate this Policy, reported a concern in good faith, or participated in an investigation related to potential misconduct.