

CURTIS BANKS GROUP

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

JUNE 2019



This statement is made on behalf of Curtis Banks Group Plc (the “Group”) pursuant to section 54 (1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our modern slavery and human trafficking statement for the financial year ending December 2018.

Our statement

This statement sets out the steps that the Curtis Banks Group has taken, and continues to take, to ensure modern slavery and human trafficking does not take place within our business, supply chain, or within our own business practices.

The Curtis Banks Group has a zero tolerance approach to any form of modern slavery and human trafficking.

Our commitment

We are committed to working to the highest professional standards and comply with all laws and regulations relevant to our business practices. We are committed to acting in an ethical manner with integrity and transparency in all business dealings, and in implementing and enforcing effective systems and controls to combat modern slavery and human trafficking.

Organisational structure

The Group is the UK-leading administrator and provider of self-invested pension products, principally SIPP’s and SSAS’s, operating across the UK within the financial services sector. The Group has its Head Office in Bristol, and over 600 employees based across three offices in England and Scotland.

The Group includes Curtis Banks Limited, Suffolk Life Annuities Limited and Suffolk Life Pensions Limited and associated companies.

Curtis Banks Pensions is a trading name of Suffolk Life Pensions Limited. Suffolk Life Pensions Limited is a company registered in England & Wales (registered number 1180742) with its registered address at 153 Princes Street, Ipswich, Suffolk IP1 1QJ. Suffolk Life Pensions Limited is authorised and regulated by the Financial Conduct Authority (number 116298). Suffolk Life Annuities Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (number 110468) and is registered in England & Wales (number 1011674) with its registered address at 153 Princes Street, Ipswich, Suffolk IP1 1QJ.

Curtis Banks Ltd is authorised and regulated by the Financial Conduct Authority (number 492502) and is registered in England and Wales (number 06758825). The registered address is 3 Temple Quay, Temple Back East, Bristol, BS1 6DZ, United Kingdom. Tel: 0117 910 7910 Fax: 0117 929 2514. We may record and monitor calls. Call charges will vary.

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Our business

The Group and our business is organised into key business units and trade under:

- 1) **Curtis Banks Limited** (Company Registration Number: 06758825)
- 2) **Suffolk Life Pensions Limited** (Company Registration Number: 01180742)
- 3) **Suffolk Life Annuities** (Company Registration Number: 01011674)
- 4) **Rivergate Legal Ltd** (Company Registration Number 10485616)
- 5) **Templemead Property Solutions Limited** (Company Registration Number: 11216858)

Both **Curtis Banks Limited** and **Suffolk Life Pensions Limited** are authorised and regulated by the **Financial Conduct Authority**, to provide trust-based SIPP products.

Suffolk Life Annuities Limited is regulated by the **Prudential Regulatory Authority**, and the **Financial Conduct Authority**, to provide insurance-based SIPP products through non-participating individual insurance contracts.

Rivergate Legal Ltd is authorised and regulated by the **Solicitors Regulation Authority** - Number: 643754.

Templemead Property Solutions Limited is authorised and regulated by the **Royal Institution of Chartered Surveyors** - Number: 810829.

Our policy and conduct

We have in place an Anti-Slavery and Human Trafficking Policy, which reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains or our business.

We also operate a number of other internal policies to ensure we are conducting business in an ethical and transparent manner, these include:

- Our **Whistleblowing Policy** ensures all employees can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisals.
- Our **Recruitment Policy** sets out the pre-employment control to verify employee eligibility to work in the UK, as a safeguard against human trafficking, or individuals being forced to work against their will.
- Our **Third Party Supplier Letters** stipulate our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all our business dealings and relationships, by explaining to our contractors, suppliers and any other business partners, and as part of our contracting processes, our specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
- Our **Employee (Code of Conduct) Handbook** explains the manner in which we behave as an organisation, and how we expect our employees to act.
- Our **Fit & Proper Policy** identifies the procedures required to assess the fitness and propriety of our key employees within the business.

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Our supply chains

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in modern slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our due diligence

The United Nations International Labour Organization, the ILO, estimates that in the past five years, 89 million people will have experienced some form of Modern Slavery for a period of time ranging from a few days to an extended period of time.

In order to deepen our understanding of human rights and the potential impacts which are most salient to our business operations, and supply chain, we have considered the nature of the Group, the sector we operate in, and our geographical context, to determine key risk areas of our business.

We have identified our supply chain as an area for ongoing focus, and have, as a consequence, conducted a number of risk mitigation measures with regards to our supply chain. We will continue to work with our suppliers to ensure that our approach to slavery and human trafficking is reflected in all our purchases of goods and services so that neither we, nor they, are involved in any way, either directly or indirectly, in slavery and human trafficking.

To ensure our suppliers share our commitment to combating modern slavery and human trafficking, we have completed due diligence procedures (as part of our supply chain), on all current and new suppliers during the initial on-boarding process.

In addition, we have refreshed our existing due diligence and have updated our modern slavery and human trafficking statement, and any applicable internal policies, detailing our approach to combating modern slavery and human trafficking.

Risk & Compliance

The prevention, detection and reporting of Modern Slavery and Human Trafficking, in any part of our business or supply chains, is the responsibility of all Curtis Banks Group employees, individuals or businesses under our control.

The Risk & Compliance department are required to be familiar with all aspects of the current regulatory regime and guidance, as well as keeping abreast of new legislation and regulatory regime changes, as well as ensuring that:

- Regulatory and legislative changes are reviewed and any necessary amendments communicated to, and/or implemented within the relevant business areas.
- Compliance policies and processes are reviewed annually, or (where applicable), on an ad-hoc basis where there are relevant regulatory/legislative changes.
- An effective risk management framework is implemented across the business.
- Compliance operate as an effective second line of defence in mitigating risk exposure.

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We also encourage openness and support to anyone who raises genuine concerns in good faith and to ensure no one suffers any detrimental treatment as a result of reporting suspicions of modern slavery or human trafficking in whatever form, may be taking place in any part of our own business, or in any of our supply chains

Risk & Compliance along with the involvement of the Curtis Banks Group Board, support the following departments:

- Legal
- Finance
- Business & Operational Support
- Human Resources (HR)
- Commercial

Our 2019 targets are as follows:

- To ensure applicable high risk suppliers have been subject to the appropriate due diligence procedures.
- To evidence and further enhance employee training, to help mitigate the risk of modern slavery.
- To continue to address risk or actual instances of modern slavery.
- To ensure a culture of respect for human rights and zero tolerance of modern slavery is respected throughout the Curtis Banks Group.
- To evidence and further enhance business level grievance mechanisms and whistle-blowing procedures currently in place to address modern slavery for employees.

Training and awareness

To ensure a high level of training, understanding, and awareness of the risks of modern slavery and human trafficking in our supply chains, and our business, we provide new and existing employees with:

- An overview and awareness of modern slavery and human trafficking, during initial new starter Induction Programmes.
- Compulsory, annual Computer Based Training (CBT) modules and tests on modern slavery and human trafficking, and bribery / corruption.
- A whistleblowing process, as part of our Bribery & Corruption Policy, to ensure all employees understand how and where they can raise concerns about how their colleagues are being treated, or practices within our business, and/or supply chain, without fear of reprisals.

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Approval

This modern slavery and human trafficking statement was approved by the Curtis Banks Group Board of Directors on 29 July 2019, and was further reviewed, signed off, on 07 August 2019 by Jane Ridgley - Chief Operating Officer.

A handwritten signature in black ink, appearing to read 'J. Ridgley', with a long, sweeping horizontal line extending to the right.

Jane Ridgley - Chief Operating Officer
07 August 2019