



DILIGENTA

2024

**MODERN
SLAVERY
STATEMENT**

MODERN SLAVERY STATEMENT 2024

As the UK's market leading life insurance and pension administrator, we recognise the crucial role we can play in addressing the risks of modern slavery and human trafficking.

Since founding in 2005, we have held a clear social commitment to our customers, colleagues and partners and developed our inclusive and open culture across our business.

As a subsidiary of Tata Consultancy Services (TCS), part of the Tata group, this commitment is in-keeping with the values and ideals which underpin all Tata companies and were first created by our founder over 150 years ago.

Our ongoing commitment has shaped us ever since and that's why we continue to do everything we can to make sure modern slavery is not taking place in our business.

In line with our core values of integrity, respect and excellence, we are particularly aware of emerging risks and remain alert to the changing nature of both modern slavery and the potential impacts that could emerge from our own operations.

We continue to reflect on and develop our approach to modern slavery across all of our supply chains and ensure that good practice is at the core of all procurement and supplier management work.

This statement contains the steps we're taking to address the risks of modern slavery. It is published in accordance with the Modern Slavery Act 2015 and sets out the steps taken by Diligenta since the introduction of the Modern Slavery Act, and during the financial year which ended on 31 December 2023, to prevent modern slavery from occurring in our business operations and supply chains.

I can confirm that no breaches of the Modern Slavery Act were reported or identified during 2023 within either our business operations or supply chain.

We value our ongoing engagement and collaboration with a broad range of stakeholder groups as part of our due diligence process – we always welcome feedback from stakeholders on our approach.



Daniel Praveen
Chief Executive Officer



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OUR BUSINESS AT A GLANCE

Diligenta is a UK-based, FCA regulated, wholly owned subsidiary of Tata Consultancy Services (TCS). We are a best-in-class provider of business process services for the life and pensions industry.

We are there for people in the moments that matter, to make a positive difference to millions of peoples' lives across the UK. We handle some of the most difficult and important calls a person can make. We are always looking for new ways to innovate in customer service and client satisfaction, and we put compassion, integrity and respect into everything we do and are a trusted long-term partner for our clients.

CUSTOMERS



23M customers



200K schemes

COLLEAGUES



6,500+
colleagues



colleague gender split
59% FEMALE / 41% MALE



13 locations
4 in India / 9 in the UK

CLIENT



~8M policies
migrated in
~5 YEARS
for 5 clients/
30 BRANDS

OUR SUPPLIERS

Over the past 12 months, we've partnered with more than 370 suppliers, with the majority registered in the UK. We manage suppliers across the business within two functions: IT and non-IT, enabling specialised individuals to focus on areas of expertise, in combination with business requirements.

OUR SUPPLIERS ARE GROUPED IN KEY DELIVERY SERVICE TYPES INCLUDING:

- IT Services and software
- Resourcing and recruitment
- Operational support services
- Customer tracing
- Archival
- Legal services
- Facilities management

While we manage IT and non-IT suppliers separately, we have an oversight framework to make sure that regulatory requirements, such as the Modern Slavery Act, are managed holistically within our Supplier Management Team.

We will only work with suppliers and service providers who can evidence they share similar values to ours, and we expect them to adopt ethical standards comparable with our own.

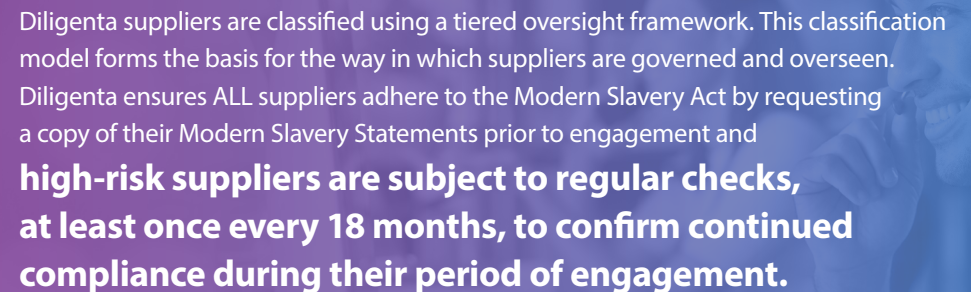
We will not knowingly engage with a supplier involved in any form, suspected or otherwise, of modern slavery or human trafficking.

We have a zero-tolerance approach to modern slavery or human trafficking in any form. If a supplier is seen to breach this policy, or is found to have any form of slavery or human trafficking in their business, or knowingly in their supply chain, we hold the right to terminate the product or services with immediate effect.

If this information becomes known, we will not hesitate to blow the whistle to the relevant authorities and will support any forthcoming prosecution which may follow.

SINCE THE MODERN SLAVERY ACT CAME INTO FORCE WE HAVE:

- carried out a full risk-based review of all of our suppliers to identify those that may be impacted by any form of modern slavery or human trafficking in our direct supply chain, which is reviewed annually;
- embedded modern slavery into the ongoing due diligence framework within Diligenta to ensure Modern Slavery Statements are in place, where applicable with the requirements of the Act;
- engaged with Diligenta low risk contracted suppliers to establish if a Modern Slavery Statement is in existence. If not, we ask that they adopt Modern Slavery Statement in order to maintain their supply;
- ensured all new contracted suppliers are asked to provide a copy of their Modern Slavery Statement (if applicable) or indicate that they are aware of the requirements of the Act;
- carried out a full appraisal of our entire supplier base to ensure that modern slavery and human trafficking does not take place. This is fully embedded in our processes and is evidenced by appropriate due diligence checks throughout the lifecycle of each contract, depending on the classification tier of the supplier.



Diligenta suppliers are classified using a tiered oversight framework. This classification model forms the basis for the way in which suppliers are governed and overseen. Diligenta ensures ALL suppliers adhere to the Modern Slavery Act by requesting a copy of their Modern Slavery Statements prior to engagement and **high-risk suppliers are subject to regular checks, at least once every 18 months, to confirm continued compliance during their period of engagement.**

OUR COMMITMENT TO PREVENTION

At Diligenta, our values, leadership, management and operations are all based around responsible and fair behaviours. We have an ongoing commitment to fully support the principles of the Modern Slavery Act, and we find any violation of human rights unacceptable. We are also committed to promoting an inclusive environment and providing a rewarding employment experience for everyone.

“As a market-leading life insurance and pension provider, and employer of 6,500+ colleagues, Diligenta recognises that human trafficking and modern slavery are huge global issues that present significant challenges for organisations.

We’re fully committed to continuous improvement in our approach and practices to these issues across all our supply chains and ensuring our suppliers are also compliant. We always act with integrity in all our interactions and take a zero-tolerance approach to these issues.”

HELEN JOHNS, PEOPLE DIRECTOR

OUR PEOPLE

Our colleagues are vital to the delivery of Diligenta’s strategy and making a positive difference to millions of peoples’ lives across the UK through the services we provide to our customers and clients.

We regularly engage with our colleagues to maintain our open and transparent culture across the business. Our people feel able to make suggestions, bring innovative ideas to life and raise issues. We are also committed to constructively engaging with our colleagues and any representatives to improve the working environment and ensure colleagues are rewarded fairly for their contribution.

Our recent Best Companies b-Heard engagement survey has shown us lots of ways in which we are providing collaboration and meaningful leadership at Diligenta, and underpins our commitment to an inclusive and safe working environment.

LIVING WAGE FOUNDATION

In 2024, Diligenta will become an accredited Living Wage employer as a sign of our commitment and support to the foundation and our colleagues.

We are committed to ensuring that we are open, fair and inclusive to all candidates during recruitment and our standards align to our corporate Values and Diversity, Inclusion & Equal Opportunities policy. Our background checks for all colleagues help mitigate the risk of the provision of bonded, forced or human trafficked labour. These include checking that all colleagues have the right to work in the UK as well as performing criminal record and credit checks. All new starters have a contract of employment setting-out all contractual rights and confirms their standard working hours. Paid overtime is not compulsory and is worked on a voluntary basis only.

CORPORATE SOCIAL RESPONSIBILITY

We have invested in the creation of a dedicated Corporate Social Responsibility and Inclusion team as part of our commitment to embedding a business ethics strategy in the way we operate, to increase actions, awareness and training, plus give back more to communities. This will also help our colleagues understand the link between business and human rights and raise awareness around modern slavery and how people and companies can help tackle it.

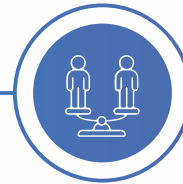
OUR TRAINING

At the heart of any policy and process are our colleagues. We know that training and raising awareness is the best way to detect and combat modern slavery and the various forms of labour exploitation and we are committed to increasing the effectiveness of our communications. All colleagues are required to undertake annual training to raise awareness of the Modern Slavery Act and encouraged to raise concerns or make disclosures when they become aware of any actual or potential violations of our Code or any misconduct that is not reflective of our values and principles.



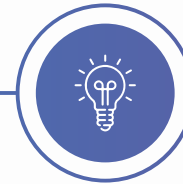
INTEGRITY

We are honest, open and trustworthy in everything we do.



RESPECT FOR THE INDIVIDUAL

We treat everyone fairly, with dignity and respect.



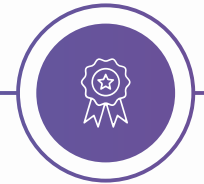
LEADING CHANGE

We continually develop and implement innovative ideas to transform and improve the way we work.



LEARNING AND SHARING

We believe in sharing knowledge, experiences and learning to enhance skills, improve performance and develop best practice.



EXCELLENCE

We aim to provide an efficient and outstanding service and deliver on our promises.

OUR POLICIES AND STANDARDS

We have a number of policies and standards which detail our commitment to operating our business in a responsible and ethical manner. These also set out how we expect our colleagues to conduct themselves.

THE FOLLOWING KEY POLICIES HELP US TO ACHIEVE AND EMBED THIS:

- **Tata Code of Conduct.** We are governed by the Tata Code of Conduct which serves as the ethical roadmap for all colleagues, directors and partners. This Code outlines our commitment to each of our stakeholders, including the communities in which we operate, and represents the core values and ideals that guide the conduct of every Tata business.

The Code includes a statement that we *“respect the human rights and dignity of all our stakeholders. We do not employ children at any of our workplaces and do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or anyone else in order to secure employment with us, or to work with us”*.

- **Diligenta Code of Conduct Statement.** Our Code of Conduct Statement, which supplements the Tata Code, explains that we are an FCA regulated company and are governed by UK legislation. This explains that, in addition to the group level policies mentioned in the Tata Code, we have our own local policies and procedures which colleagues must be aware of and adhere to. It points to our key policies and subject matter which include (this is not an exhaustive list):
 - Whistleblowing policy
 - Diversity, Inclusion and Equal Opportunities Policy
 - Modern Slavery Act Statement
 - Dignity at Work Policy
 - Financial Crime Policies (including Anti-Money Laundering, Bribery & Corruption and Fraud)
 - Corporate Social Responsibility Policy
- **Procurement and Supplier Management Policy Statement.** This is a Board-approved statement which was last reviewed in 2022. The Policy commits all stakeholders to ensure that our processes and procedures are carried out, with the best of endeavours to make the best purchasing decisions and that it manages supplier relationships in the most effective manner. Detailed processes and procedures are further reflected in an associated Procedure Manual and Policy Compliant Procedures for IT Procurement.

- **Speak Up.** We value ‘speaking up’ as part of our culture and values and encourage anyone who has a concern about our ethics, conduct or our relationships with third parties to report it without delay. Our Speak Up service is managed independently by a third-party, allowing colleagues, agency workers, third parties and suppliers to report any concerns confidentially or anonymously if they are uncomfortable reporting concerns openly. Any concerns reported are taken seriously and thoroughly investigated in a sensitive and confidential manner with all colleagues trained annually on how to raise any concerns via the Speak Up line. There were no modern slavery concerns reported through Speak Up in 2023.

SPEAK UP DETAILS

Independent reporting service:
Safecall

Telephone:
0800 915 1571

On-line incident report:
www.safecall.co.uk/report

LEGISLATION AND GUIDANCE

We continue to monitor the outcome of the UK government's independent review of the Modern Slavery Act 2015 and the subsequent public consultation on transparency in supply chains. While the UK government has confirmed that it will be making significant changes to the provisions in the Modern Slavery Act 2015, it has yet to publish the timeframe for any reforms to be introduced. We continue to await the outcome of any changes to the Act and fully commit to address and implement all applicable requirements.

WHAT'S NEXT IN 2024?

We will continue to review and improve our approach to fulfil our commitment that modern slavery is not taking place in our supply chains or in our business.

HOW WILL WE DO THIS?

- Adhering to the Modern Slavery Act will continue to be a fundamental part of the Diligenta supplier engagement, with specific contractual clauses defining requirements with continual assessment, where appropriate.
- Take any action needed once amendments made to the Modern Slavery Act 2015 are announced. Action will be taken to ensure we continue to comply with any changes to legislative requirements.
- Review and update our mandatory training and test materials to ensure the information and guidance provided to our colleagues is up to date and informs them of any key legislative changes they should be aware of.
- Embedding a business ethics strategy in how we operate, with actions and partnerships to raise awareness.

APPROVAL OF THIS STATEMENT

Diligenta's Modern Slavery Statement 2024 was approved by the Diligenta Board of Directors on 19 March 2024.

Signed:



Daniel Praveen
Chief Executive Officer



DILIGENTA