

# Modern Slavery Statement 2023

# Contents

---

- 3 Our mutual responsibility
- 4 How we create and deliver value
- 6 Society and communities
- 7 Our policies and how they relate to modern slavery
- 8 What we do
- 9 Our progress and commitments
- 10 Royal London subsidiaries

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps we have taken during 2023 to prevent modern slavery and human trafficking in our business and supply chain.



# Our mutual responsibility

Proudly customer-owned since 1861, mutuality remains at the heart of Royal London's Purpose: 'Protecting today, investing in tomorrow. Together we are mutually responsible.'

We offer protection, long-term savings and asset management solutions in the UK and Ireland – and our mutuality is as relevant as when our business was first established. We remain committed to helping customers build their financial resilience and, through our investments, we aim to help build a world worth retiring into.

Our Purpose also shapes our commitment to conducting our business with honesty and integrity. We have zero tolerance for slavery and human trafficking, and, in our eighth Modern Slavery Statement, we are able to show how we continue to make good progress in minimising the risk in our business, supply chain, and investments.

## It's everyone's business.



# How we create and deliver value

Through a clear strategy, underpinned by our Purpose, we create value for the benefit of our stakeholders.

**UK<sup>1</sup>**

Providing propositions to customers and employers, primarily through independent financial advisers

**1**

**Long-term savings:**

- Workplace Pensions
- Individual Pensions
- Annuities
- Later Life

**2,270,000** policies

**2**

**Protection:**

- Life Insurance
- Illness and Income Protection
- Business Protection

**1,510,000** policies

**1 2**

**Longstanding customers<sup>2</sup>:**

- Pensions
- Annuities
- Protection

**4,310,000** policies

**Asset management**

Providing investment propositions to Royal London's life and pensions customers and to external institutional and wholesale clients, primarily through intermediaries

**1**

**Collective investment funds and segregated mandates:**

- Equities
- Fixed Income
- Multi asset
- Private Assets

**£162.3bn AUM<sup>3</sup>**

**Ireland**

Providing propositions to customers through brokers

**1**

**Long-term savings:**

- Individual Pensions

**2**

**Protection:**

- Life Insurance
- Illness and Income Protection
- Business Protection

**477,000** policies

→ You'll find full details of our businesses on our website, and a list of our subsidiaries can be found at the end of this statement. Our annual reports and other corporate information can also be found on our website.

1. Customers of Aegon UK are not included as they are yet to be integrated. Policies are expected to transfer to Royal London in the second half of 2024, subject to the completion of a court-approved Part VII transfer.  
 2. The products we manage for longstanding customers include those closed to new business.  
 3. The Group's AUM (assets under management) include external assets managed on behalf of third parties and internal assets managed on behalf of the Royal London Group.

## Our colleagues

Our Group employs 4,289 colleagues (as of December 2023), working in a hybrid way from seven offices and their homes across the UK and Ireland. A key part of achieving our Purpose is having a unique culture that enables all of our colleagues to contribute to our success.

Our culture is underpinned by our four 'Spirit of Royal London' values: We are Empowered, We are Trustworthy, We Achieve and We Collaborate. These values help shape our People Promise of providing somewhere to work that is inclusive, responsible, enjoyable and fulfilling. For more information, take a look at the [career pages](#) on our website.

We are committed to investing in colleague growth and development. We provide support for professional qualifications alongside a comprehensive skills and career development offering. During the year we focused on raising the profile of internal opportunities, helping empower colleagues to drive their own development in line with personal aspirations. We spotlighted internal vacancies and secondment opportunities and a further 150 colleagues took part in our Career Confidence programme.

We are proud of our calendar of inclusion activities and events, supported by our four colleague-led inclusion networks: DAWN (Disability Awareness Network including neurodiversity), our LGBTQ+ PRIDE network, REACH (Race, Ethnicity and Cultural Heritage) and our Women's Network. The 2023 calendar included support for colleagues to attend PRIDE events in Edinburgh and Dublin, as well as activities to celebrate Black History Month, International Men's and International Women's Day, World Mental Health Day and World Menopause Day. We also celebrated National Inclusion Week in September, with a series of events on the theme of allyship.

## Our suppliers

We worked with around 1,100 suppliers in 2023, spending approximately £430 million with them. Our suppliers provide goods and services categorised into Outsourced Services, IT & Telecoms, Professional Services, People, Customer and Workplace Services.

We proactively manage our supply chain and expect high ethical standards from our suppliers.



# Society and communities

For the past three years, we are proud to have committed over 1% of our operating profits to further our social impact efforts, promoting financial resilience and moving fairly to a sustainable world. In 2023 we contributed £2.4m towards our social impact initiatives<sup>1</sup>.

Through our partnership with Turn2us, we have been helping people in financial crisis since 2020 – and through our new partnership with Cancer Research UK, launched in 2023, we are supporting research into hard-to-treat cancers to protect more people against life shocks that we know impact their financial resilience. Our Changemakers programme supports social enterprises across the UK and Ireland aligned to our Purpose. We will continue to develop our approach with updates being made available on the [social impact pages](#) on our website.

---

**Since 2020 we have invested over £1m in our Changemakers programme to drive social innovations around some of society's biggest challenges.**

---

**£2.4m**

committed to social impact initiatives in 2023

**Over £1m**

invested in social enterprises since 2020 through our Changemakers programme

1. We donated £2.2m directly to charities and social enterprises and funded an additional £0.2m to support related social impact activities.



# Our policies and how they relate to modern slavery

**We strive to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business.**

**We have a number of internal policies that are relevant to identifying and mitigating modern slavery risks. These are hosted internally and available to all colleagues. Those applicable to suppliers are shared with them.**

## Code of Conduct

This sets out our core values and behaviours, specifically of trust and respect for each other and the communities in which we operate. It helps to ensure that we operate within the law and take account of the various regulatory frameworks that apply to our business.

## Procurement and Third Party Management policy

This policy governs our procurement processes and the ongoing oversight and management of our supplier relationships, including the controls in place to identify, report and manage risks relating to the relationship, which include those related to modern slavery. The policy also includes our approach to initial and ongoing due diligence, which includes that carried out in relation to modern slavery.

## Recruitment policy

This policy outlines how we undertake internal and external recruitment, which includes due diligence on any contractors, and the eligibility checks we undertake on candidates.

## Supplier Code of Conduct

This sets out the standards we expect from our suppliers. It highlights the UK Modern Slavery Act 2015 as well as other areas regarding labour standards and ethical treatment of staff. The UN Guiding Principles on Business and Human Rights and the Core Conventions of the International Labour Organisation were consulted in the development of this code, to ensure alignment. This Code was updated in 2023, to reflect new standards. It was also published on our [website](#).

## Whistleblowing policy

This policy helps promote high standards of service and encourages high ethical standards throughout the Royal London Group. It ensures that there is a procedure in place for colleagues to raise concerns of malpractice and that these are investigated.



# What we do

## How we support our colleagues

### Training and awareness

All our colleagues undertake annual training on topics that relate to modern slavery: anti-bribery, anti-money laundering, fraud prevention and whistleblowing.

Colleagues who are directly involved in procurement and supplier management are provided with additional modern slavery training via our internal learning platform. This provides a specific learning module and additional material on the topic including UK Home Office reports and Non-Governmental Organisations (NGO) created podcasts, with the objective of driving up overall awareness and understanding.

### Recruitment

We have a well-managed approach to recruitment. We are a UK Real Living Wage employer, with all of our salary ranges underpinned by the levels set by the Living Wage Foundation. Our offices are based solely in the UK and Ireland, and we ensure that candidates are appropriately vetted and eligible to work in the UK or Ireland as part of the recruitment process.

## How we work with our suppliers

### Procurement

We engage with suppliers through a formal process which is governed by our Procurement and Third Party Management policy. We review suppliers' modern slavery statements (where one is applicable) and undertake due diligence depending on the associated risk.

In our contracts, we require suppliers to comply with the Modern Slavery Act 2015 ('Act') and to have their own policies and procedures with respect to compliance with the Act.

We also have clear expectations regarding our right to audit or to request that suppliers undertake their own independent audit, which allows us to focus on modern slavery if there is a perceived risk in this area.

### Supplier management

We appoint relationship managers to our material and strategic suppliers. We have a Third-Party Risk Management Framework, which outlines the way we manage our suppliers. This Framework includes our policy, which is key to the management of our suppliers. We undertake ongoing due diligence on our suppliers across a range of topics. This includes checking on key aspects of modern slavery.

We ensure that all supplier employees who are working on our premises are paid the UK Real Living Wage set by the Living Wage Foundation.

Our business, including our Procurement and Supplier Management operations, is underpinned by a three lines of defence risk and compliance model. More information about our approach to risk can be found in our [annual report](#) and on our [website](#).

## How we invest responsibly

We are committed to acting and investing responsibly. Environmental, social and governance (ESG) risks and opportunities are integrated into our investment approach, including considering the issue of modern slavery. Engagement is a key part of our ESG strategy and, if required, modern slavery may be a topic we consult upon with investee companies.

We review our engagement themes and topics every two years, in collaboration with the investment teams and external clients. This enables us to identify the most relevant issues for our investments. In 2024, we will increase our engagement focus on human rights and modern slavery.

Within our asset management business, Royal London Asset Management, we have an ESG Dashboard for internal fund managers. The Dashboard shows our in-house ESG and climate (C) scores, which include a social score comprised of underlying data points, including human rights metrics. The Dashboard also has the information on engagement and proxy voting.

This information can be used as a tool to support integration of ESG into investment decision making. In addition, external data providers supply additional information on controversies related to modern slavery violations.





# Our progress and commitments

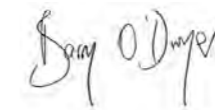
Focus area	Commitment	Progress in 2023	Actions planned for 2024
Our suppliers	Training and awareness	We continued to provide training and support to all colleagues. We promoted the modern slavery learning module and associated materials to our Supplier Management and Procurement community and other colleagues in the business who have responsibilities relating to suppliers. A new dashboard was created which includes the details of colleagues who have engaged with the learning module and allows for targeted support where needed.	We will continue to target appropriate learning to colleagues to ensure they are clear on our expectations of them in their roles and we grow their understanding and skills.
	Ongoing due diligence	We have continued to undertake due diligence on our suppliers and subcontractors, and have updated processes to simplify how we do this. We have also updated our assessment materials, as part of targeted reviews (as detailed below) and will use these in our ongoing due diligence. Our dashboard shows the suppliers who were part of these targeted reviews.	We will be producing environmental, social and governance (ESG) packs for our Supplier Management community, which will include enhanced detail about the approach taken with our suppliers.
	Supplier Code of Conduct ('Code')	We have updated the Code and included the number of suppliers who have received this in our dashboard. The code has also been added to our <a href="#">website</a> .	We will continue to share our Code with suppliers and will be including levels of engagement in the reporting dashboard mentioned above. We will also continue to request material suppliers' own codes of conduct, where relevant.
	Targeted support	We have continued to offer support to our suppliers, engaging with them on the topic of modern slavery at joint governance forums.	We will continue to offer support to our suppliers where it helps them improve their controls relating to modern slavery.
	Comprehensive reviews	We undertook 'deep dives' with material suppliers, which allowed for the development of new materials for review purposes. We uncovered no concerns within these reviews.	We will be undertaking additional reviews in 2024, and further improving the process we use for this.
Our colleagues	ESG Dashboard	We have continued to build out the capability in our Dashboard and Power BI solutions. This has included technical solutions around regulatory reporting and on ESG and C reporting for our funds.	As with previous years, we will continue to develop our technical capabilities. We will expand our focus on human rights and modern slavery, where we seek to build knowledge and drive better outcomes through individual and collaborative engagement opportunities.

## Incidences of modern slavery in our supply chain

Any instances of modern slavery in our supply chain would be reported to our Group Executive Risk Committee. There have been no reported instances to the Committee of modern slavery in our business or supply chain in 2023.

## Statement confirmation

This statement was approved by The Royal London Mutual Insurance Society Limited Board in May 2024.



**Barry O'Dwyer**  
Group Chief Executive Officer

# Royal London subsidiaries

**This statement applies to the Royal London Group (The Royal London Mutual Insurance Society Limited) and its operational subsidiaries, as at the end of 2023, which are listed below.**

Cambridge Research Park Management Company Limited	Royal London Asset Management Property Holdings Limited
Hornby Road Investments Limited	RLUM Limited
Mortgage Excellence Limited	Royal London (UK) Holdings Limited
PMGI Limited	Royal London Asset Management Holdings Limited
PMHC Limited	Royal London Asset Management Limited
PM Holdings Limited	Royal London Cambridge Limited
Police Housing Fund Limited	Royal London Insurance Designated Activity Company
ProperTies Living Limited	Royal London Management Services Limited
RL Finance Bonds No. 3 Plc	Royal London Marketing Limited
RL Finance Bonds No. 4 Plc	Royal London Savings Limited
RL Finance Bonds No. 6 plc	Royal London Unit Trust Managers Limited
RL Wizard Holdings Limited	Vision Park Management Limited
Royal London Asset Management Living General Partner Limited	Wealth Wizards Benefits Limited
Royal London Asset Management Natural Capital General Partner Limited	Wealth Wizards Limited

