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Modern Slavery Act Transparency Statement

24th March 2023

NOW: Pensions Limited and NOW: Pension Trustee Limited

Information about NOW: Pensions Limited and NOW: Pension Trustee Limited (collectively "NOW: Pensions") organisational structure, business and supply chains

NOW: Pensions is an award-winning UK workplace pension provider. We look after the pension savings of tens of thousands of employers and millions of members from a wide range of industry sectors. The NOW: Pensions Trust (Scheme) comprises the following entities:

NOW: Pensions Limited (NPL) provides a workplace pension with independent governance to employers of all sizes across the UK and helps payroll bureaux and financial advisers support their clients. NPL offers a value for money workplace pension designed specifically with the auto enrolment market in mind. Its mission is to help everyone save for a better, more financially secure future. NPL is owned by Cardano Holding Limited and is part of the Cardano Group.

NOW: Pension Trustee Limited (NPTL) is the Scheme Trustee and oversees decisions on all crucial Scheme issues such as charges, investment strategy and administration. It closely monitors the performance of the management team and investment manager, taking action when required to safeguard members. The role of the Trustee Board is to ensure that the Scheme is run in the best interests of the members and to oversee NPL and the service providers, as necessary.

NOW: Pensions operates in the financial services sector and therefore does not provide services that are generally considered to be at high-risk of using forced labour (such as agriculture, construction, domestic, hospitality and manufacturing), neither are the provision of its services reliant on complex supply chains.

NOW: Pensions is committed to the highest ethical standards and does not tolerate unethical practices anywhere in its business. We are committed to understanding the risks modern slavery presents and ensuring that there is no modern slavery in its business and supply chains, which is the focus of this statement.

NPL and NPTL have a financial year end of 31 December.

Policies relating to modern slavery

NOW: Pensions does not tolerate any form of modern slavery and takes action to prevent it being used in the supply of services to NOW: Pensions:

- Employment is freely chosen: NOW: Pensions does not recruit forced labour; no employees are required to lodge their identity papers or other deposits; and all employees are free to leave employment after reasonable notice.
- Physical abuse, threats and other harassment is not tolerated.
- Punitive deductions from salary are not made.
- Child labour is not used.
- Full legal wages are paid in line with the higher of the legal minimum wage or industry benchmarks standards.
- All employees are given documented terms and conditions of employment which include details of wages, benefits and other remuneration before commencing employment.

While NOW: Pensions does not tolerate any form of slavery or bonded labour, if employees become aware of any of these practices, they must notify the Director of Legal & Compliance immediately. To encourage colleagues to report any wrongdoing, notifications are covered by NOW: Pensions' Whistleblowing Policy which actively encourages such reporting. Any reports made are treated in confidence and are fully investigated with appropriate and proportionate resulting actions taken.

NPL's position on modern slavery is set out in the employee handbook. This requires employees to report identified forms of modern slavery.

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The Cardano Group is working to implement a Code of Conduct which will require all staff to commit to fair labour practices across the Cardano Group and in our suppliers and contractors and will also place responsibility on all colleagues to be alert to modern slavery risks and raise any concerns.

Staff Training

Compulsory training on NOW: Pensions' approach to addressing modern slavery is included as part of all colleagues' induction training and annual refresher training thereafter. This covers indicators of modern slavery and how to report concerns. NOW: Pensions recently updated its training program to ensure that all staff are provided with a more comprehensive training package which aims to ensure awareness of modern slavery red flags. Staff are then assessed on their understanding of the training provided.

Due diligence process relating to modern slavery and human trafficking in our business and supply chain

NOW: Pensions has performed an analysis of the following areas of its supply chain:

- Data Governance;
- Finance / Internal Audit / Legal / Compliance;
- HR;
- Investment;
- Marketing;
- Operations;
- Facilities; and
- IT.

Having conducted a full and thorough assessment of our service providers and suppliers, NOW: Pensions is confident that, given the nature of its supply chain, the majority of its tier 1 UK, US and EU supply chain has a low risk of modern slavery. Where supply chains fall outside of the UK, US and EU, we acknowledge that risks will be higher whilst at the same time recognising that modern slavery and human trafficking are a global risk.

NOW: Pensions' supply chains do not involve inputs of manufactured or processed goods from high-risk jurisdictions. Other than an ongoing relationship with technology / telecommunications hardware providers for the use of IT equipment internally, there are no supply chains of imported goods from higher risk jurisdictions[1]. Although NOW: Pensions does not, therefore, conduct modern slavery due diligence on all suppliers, we continue to make improvements to our processes and broaden the scope of suppliers meeting the threshold for such review.

The NOW: Pensions Supplier Management Board includes, as part of its procurement process outlined in our Procurement Policy, questions about whether a proposed new supplier is at high risk of slavery and human trafficking taking place within its organisation. If it is, due diligence is required to ensure that this is not occurring at the proposed supplier. We also require sight of key suppliers' anti-slavery policy before they are on-boarded and on an annual basis thereafter.

NOW: Pensions does have contractual provisions with some of its suppliers that specifically address modern slavery risks and such provisions are included in its suite of template contracts. NOW: Pensions has improved its approach over the financial year and now seeks to include such provisions in all of its supplier contracts, where possible. This is recorded and monitored on our internal Contracts Database.

Investment process relating to modern slavery

Cardano Risk Management Limited (CRML) is NPTL's Investment Manager and, subject to its asset management duties, NPTL supports CRML's approach to align, where possible, its portfolios in the long-term to support the United Nations Sustainable Development Goals (and specifically respect and support for human rights and avoid human rights abuses as set out in the UN Global Compact Principles) and the Paris Climate Agreement.

NOW: Pensions respects and supports human rights globally and opposes human rights abuses. We collaborate with CRML on a range of sustainable development goals, including human rights and the living wage.

NOW: Pensions has in place a Statement of Investment Principles (SIP), which sets out the investment beliefs, high level objectives, policies and principles governing the investment decisions made by NPTL. As a core belief, NOW:

[1] Global Slavery Index http://www.globalslaveryindex.org/index/#

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Pensions, as long-term investors, incorporate environmental, social and governance (ESG) factors into a Responsible Investment process that is integral to long-term financial success.

NOW: Pensions achieved its commitment that by the end of 2021 it would have at least half of the portfolio's net asset value in investments which support NPTL's Responsible Investment beliefs. NPTL expects CRML as its Investment Manager to be a signatory to ESG industry initiatives and to engage with them collaboratively, such as Principles for Responsible Investment, Climate Action 100+, the Net Zero Asset Managers Initiative, the Institutional Investors Group on Climate Change (or equivalent group in other regions), the Diversity Project and to adopt the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

The residual risk of modern slavery

As NOW: Pensions does not provide or procure services that are deemed high-risk, nor demands inputs from high-risk jurisdictions, we are confident that the potential for modern slavery and human trafficking within our supply chain and business remains low. NOW: Pensions previously identified a key risk in relation to IT services procured through a supplier in Eastern Europe but, over the course of the financial year, this risk has been removed by withdrawing services from this supplier.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes NOW: Pensions Limited and NOW: Pension Trustee Limited's slavery and human trafficking statement for the financial year ending 31 December 2022.

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