Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out XPS Pensions Group plc's zero-tolerance stance to modern slavery and human trafficking in our organisation and our supply chain. This statement applies to all businesses within the XPS Pensions Group of companies, including third party suppliers with access to XPS Pensions Group or client property, systems or data and any other parties working on behalf of XPS Pensions Group. It relates to actions and activities during the financial year 1 April 2022 to 31 March 2023.

We strive to work to the highest professional standards to help ensure that we comply with all laws and regulations applicable to the organisation. Our suppliers are expected to follow the same high standards.

Our Business

XPS Pensions Group plc is listed on the London Stock Exchange Main Market and consists of several limited company subsidiaries. XPS Pensions Group is a leading pensions consulting and administration business fully focussed on UK pension schemes. XPS combines expertise, insight and technology to address the needs of over 1,500 pension schemes and their sponsoring employers on an ongoing and project basis. We undertake pensions administration for over one million members and provide advisory services to schemes and corporate sponsors in respect of schemes of all sizes, including 51 with assets over £1bn.

We have over 1,600 employees based in 18 locations across the UK.

Our Supply Chain

XPS is committed to the highest standards of ethical and business conduct as it relates to the procurement of goods and services. Our relationships with our third-party providers, including our contract labour, are defined by contracts, which are based on lawful, ethical, fair, and efficient practices.

We have a stable list of suppliers. We continue to review our supplier verification process to include checks on material new suppliers including their commitment and policies regarding the prevention of human trafficking and slavery and we will not award or renew business with any supplier who fails this test.

Given the nature of our business, and the outcome of our annual risk assessment process, we believe that the risk of modern slavery and human trafficking in our supply chain is low.

Nonetheless, we recognise that the possibility does exist. Therefore, in order to mitigate this risk we have reviewed our supplier code of conduct and sent this to all suppliers. We have prioritised specific follow up actions with those suppliers who we consider to be higher risk and will keep this under review. Our supplier on-boarding process has been strengthened and reviewed and will remain under review to ensure that we adapt to accommodate any issues that come up as part of the reissue of our supplier code of conduct.

Policy Statement

We are committed to ensuring that within our control there are no breaches appertaining to section 54 (1) of the Modern Slavery Act and we will not use or allow the use of forced or compulsory labour, slavery or human trafficking in the course of our business activities either in our business or in any part of our supply chain. This will be achieved by:

Inclusion, Equality and Diversity

At XPS our vision is to create a vibrant place to work where difference is recognised as a strength and where talented people can flourish and achieve their highest potential. We know that talent is not dictated by race, ethnicity, gender, disability, sexual orientation, age, religion, social class or background. We recognise the value that people from different backgrounds can bring to the workplace. As an employer XPS Pensions Group has a responsibility for promoting employment policies and practices within this workplace, which seek to eliminate unlawful and unfair discrimination and fulfil our legal obligations.

Our policies and working practices promote equal opportunities and diversity and provide a safe working environment. These policies include:

- Inclusion and Diversity, including equal opportunities and non-discrimination in the workplace, in recruitment, training and promotion irrespective of gender, age, religion or belief, disability, sexual orientation and employment status;
- Protection from harassment or intimidation;
- Flexible working and other family-friendly policies;
- Grievance and whistle-blowing practices and procedures;
- Health and Safety policy and procedures to ensure we provide a healthy working environment where we take all reasonable steps to prevent injury and illness to our employees, visitors and contractors.

We have an Inclusion and Diversity Committee. The group is made up of representatives from across the business and the network chairs and reports to the board of XPS Pensions Group plc. The Committee was set up to develop and improve policies and practices relating to inclusion, diversity and equality and to also monitor performance and make recommendations. We have 5 employee networks; the women's network, menopause network, LGBT+ network, disability network and multi-cultural network, which aim to further support our objective of building an inclusive workplace culture and supporting the needs of our diverse range of employees.

Corporate Responsibility

We have a Sustainability Committee who oversee that the sustainable future of XPS Pensions Group is aligned with employee wellbeing, and XPS Pensions Group continuing to be a great place to work. We have appointed Mental Health at Work to provide mental health training for our managers; we launched our Mental Health Ally Network in 2021 to support colleagues and we actively communicate with employees, promoting their wellbeing, throughout the year.

XPS operates a Vulnerable Customers Policy, which in tandem with annual training, provides clear guidance to all employees around vulnerabilities our customers may experience, barriers they may face when dealing with professional services such as ours, and what we can do to make our service as accessible and inclusive as possible.

Recruitment

XPS operates a robust recruitment and selection policy which outlines the Group's commitment to attracting talent with the requisite skill set, across diverse working groups to ensure we remain an award-winning company within the industry. Underpinning this, we have implemented a robust compliance checks process, ensuring the risk of forced and compulsory labour is eliminated. All newly hired employees and non-employees (agency workers) undergo background vetting checks before they commence employment with us. The checks include, right to work, credit, criminal, terrorist and reference checks and any areas for concern are investigated before the employment commences.

Precautions are in pace to reduce the risk of financial coercion; these precautions include random checking of bank accounts stored in our HRIS (Human Resources Information System).

Remuneration

XPS has made a commitment to become a Real Living Wage employer and have reviewed remuneration for all employees to ensure everyone receives a reward package that meets the criteria. We continue to externally benchmark our overall reward packages for competitiveness.

Whistleblowing

XPS has a clear, formalised Whistleblowing Policy and procedure available to all staff in order to confidentially raise concerns about perceived wrongdoing, non-compliance with our own standards, regulatory requirements and/or the law. We have a confidential helpline, run by a third party, Expolink, which enables staff to report such concerns without fear of sanction or disadvantage. This helpline is promoted through the XPS intranet and posters around our offices. Incidents are reported and then reviewed by the Board at the next available meeting, or sooner if appropriate. The XPS Audit & Risk Committee reviews the policy and process annually to ensure that they remain fit for purpose.

Training

We provide modern slavery training to all employees annually, to ensure proper understanding of the risks imposed by modern slavery and human trafficking, in the context of the firm's business and supply chains. We ensure the training is completed by everyone.

Future Developments

We acknowledge the continuing commitment required to detect and prevent modern slavery and human trafficking within XPS and our supplier base. Over the next financial year, we plan to ensure further development in the following areas:

- We will review our supplier code of conduct and re-issue this to suppliers;
- We will review the real living wage commitment of our suppliers and the training that they offer their employees in relation to modern slavery;
- We will provide extended modern slavery training to employees who have direct responsibility for supply chain management, particularly with respect to mitigating risks within the supply chain; and
- We intend to review employee reward packages, with the intention of aligning packages across the group.

Our commitment

We will not use any business or organisation which is involved in this activity and will review and update this policy annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2023. It has been approved by the Board of Directors of XPS on 23 March 2023 as reflected by the the Director's signature below.

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Ben Bramhall
Co-Chief Executive Officer