

CURTIS BANKS GROUP

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

JUNE 2022

This Statement is made on behalf of Curtis Banks Group Plc ('the Group') pursuant to section 54 (Part 6) of the Modern Slavery Act 2015 (the 'Act') and constitutes our Modern Slavery and Human Trafficking Statement for the Financial Year ending December 2021.

Statement

This statement sets out the steps that the 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 Group has a zero tolerance approach to any form of modern slavery and human trafficking.

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.

Approach

As a UK-based financial services business, the Group has a relatively low risk of modern slavery within its employee base and direct supply chain. Indirect suppliers further down our supply chain however present a potential elevated risk, therefore whilst we recognise there may be risk further down our supply chain, at this time our approach focuses primarily on those where we have direct control.

Organisational Structure

The Group is a UK-leading administrator and provider, principally Self-Invested Pension Products (SIPP's), and Small Self-Administered Schemes (SSAS's), operating across the UK, within the financial services sector.

The Group has its Head Office in Bristol, and over 800 employees based across multiple office locations in both England and Scotland.

The Group includes Curtis Banks Limited, Suffolk Life Annuities Limited, Suffolk Life Pensions Limited, Talbot & Muir Limited, the Dunstan Thomas Group and other associated companies.

CONT: Organisational Structure

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) **Talbot & Muir Limited** (Company Registration Number 02869547)
- 6) **Dunstan Thomas Group** (Company Registration Number 08160246)

Curtis Banks Limited, Suffolk Life Pensions Limited and Talbot and Muir 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.

Dunstan Thomas Group is a non-regulated retirement solutions innovator and IT outsourcer.

Policy & Conduct

We have in place a Modern 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 (where possible), that modern slavery and human trafficking is not taking place anywhere in our supply chains or our business.

As part of that commitment to upholding the highest standards of governance and risk management we also have documentation in place that is relevant to managing the risk of modern slavery, and in the promotion of wider safe working practices that ensures we are conducting business in an ethical and transparent manner:

- **Whistleblowing Policy:** To ensure all employees can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisals.
- **Recruitment Process:** To set out controls that verify employee eligibility to work in the UK as a safeguard against human trafficking, or individuals being forced to work against their will.
- **Equality & Diversity Policy:** To ensure that we are committed to creating and sustaining a non-discriminatory working environment based on equal treatment for its entire workforce, and to the elimination of unlawful and unfair discrimination.
- **Flexible Working Employee Guide:** To stipulate our procedures for requesting a change to your contractual working hours and/or pattern in a fair and consistent way (in line with The Advisory, Conciliation and Arbitration Service (ACAS)).
- **Third Party Supplier Letters:** To stipulate our zero-tolerance approach to modern slavery and our commitment to acting ethically, and with integrity in our business dealings/ relationships by explaining to our contractors, suppliers and associated businesses, our specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, adults or children.
- **Employee (Code of Conduct) Handbook:** To explain the manner in which we behave as an organisation, and how we expect our employees to conduct themselves.
- **Fit & Proper Framework:** To identify the procedures required to assess the fitness and propriety of our key employees within the business.

Recruitment

The Curtis Banks Group is an equal opportunity employer who acts with confidence in the knowledge that external recruitment agencies understand our commitment to responsible and transparent employment processes. We carry out pre-employment checks to ensure that anyone we employ has the right to work in the UK (including a Disclosure and Barring (DBS) check. Once initial employment checks are satisfactorily completed employees are placed on a contract or flexible working plan that clearly stipulates their expected working patterns.

Supply Chain

The Group are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery & human trafficking throughout our supply chains.

In return we expect the same very high standards from all our contractors, suppliers and other business partners, in the expectation that our contractors, suppliers and other business partners will hold their own suppliers to the very same high standards (including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children).

Our approach reaches beyond our supply chain to our employees and those we employ on a contract basis. We are a “Living Wage” accredited employer and this commitment extends to requiring sub-contractors, such as cleaners, to be paid at least the Living Wage Level.

Due Diligence

Modern slavery has a significant human and economic impact globally, it is estimated to be a £150 billion trade which involves approximately 41 million people in some form of slavery, including forced labour, the sale and trafficking of people, forced and servile marriage and the exploitation of children. The Curtis Banks Group believe that all UK businesses have a critical role to play in tackling modern slavery and human trafficking. Therefore 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 ongoing 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, the Group operate ongoing 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 to any newly acquired Group business acquisitions.

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 Group employees, individuals or associated businesses under our control.

The Risk and Compliance departments 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), and on an ad-hoc basis where there are relevant regulatory/legislative changes required.
- An effective risk management framework is implemented across the business.

That both the Risk and Compliance departments operate as an effective second line of defence in mitigating risk exposure

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The Risk and Compliance departments along with the involvement of the Curtis Banks Group Board, support initiatives that mitigate the risk of modern slavery and/or human trafficking via the business:

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 and/or human trafficking in whatever form, may be taking place in any part of our own business, or in any of our supply chains.

As a result we continue to build capacity within the Curtis Banks Group to manage the risk of modern slavery, and understand risk exposure within our operations, our supply chain, and our services.

During 2022, our focus will be as follows:

- We will review and look to enhance a wider internal employee training programme for all employees to help mitigate the risk of modern slavery and to support awareness and understanding.
- To continue the strengthening of our supplier due diligence processes to ensure third party suppliers have been subject to the appropriate due diligence procedures.
- To continue to address risk or actual instances of modern slavery & human trafficking.
- To continue to ensure a culture of respect for human rights and zero tolerance of modern slavery & human trafficking is respected throughout the Group.
- To evidence and further enhance business level grievance mechanisms and whistleblowing procedures currently in place to address the risk of modern slavery for Group employees.

We believe that these actions will support the strengthening of our framework as we await the outcome of the proposed new modern slavery mandatory requirements.

Training & 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 the initial Induction Programme.
- Compulsory, annual Computer Based Training (CBT) Modules/Tests on Modern Slavery & Human Trafficking, and Bribery & Corruption.
- A Whistleblowing Process as part of our Bribery & Corruption Policy to ensure all employees can raise concerns about how colleagues are being treated, or about practices within our business 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 26/05/2022, and was further reviewed, signed off, on the 26/05/2022 by **Jane Ridgley - Chief Operating Officer**.

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

Jane Ridgley - Chief Operating Officer
26/05/2022