

Punter Southall Group Limited (“The Group” or “PSG”)

PSG Modern Slavery Statement

Introduction

PSG knows that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and a growing issue given the rapid rise in global migration, existing in every region in the world and every type of economy. PSG has a zero tolerance approach to Modern Slavery of any kind. It is committed fully to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within the business or its supply chain.

Our Business and Supply Chains

PSG is a leading financial services company which operates primarily in the United Kingdom. The Group and its associated companies provide workplace savings and consulting, personal financial planning, investment research and publications; investment solutions to individuals, professional advisers and charities; critical illness protection; data-driven solutions to support cost saving, process improvement and loss recovery opportunities. PSG's product supply chains include providers of goods and services which are predominantly based in the UK and therefore subject to the UK's Modern Slavery Act.

Policies and Contractual Controls

PSG operates a number of internal policies to ensure that it conducts business in an ethical and transparent manner. These confirm that PSG will not tolerate or condone abuse of human rights within any part of its business or supply chains and will take seriously any allegations that human rights are not properly respected. Policies include:

- Group Purchasing Policy; which ensures that purchases are on appropriate commercial and ethical terms;
- Anti-Bribery and Corruption Policy;
- Environmental Policy;
- Corporate Social Responsibility Policy;
- Conflicts of Interest Policy;
- Fraud Prevention Policy; and
- Gifts and Entertainment Policy.

We also operate a Whistleblowing Policy which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery.

Due Diligence and Audits of Suppliers and Supply Chain

PSG understands that its biggest exposure to Modern Slavery is in its product and service

supply chains. Due diligence ensures that high risk critical suppliers are identified who are then required to confirm that no part of their business operations contradicts PSG's approach to Modern Slavery.

Training

We undertake conduct training for all staff; for those involved in procurement this is extended to ensure they understand the implications of Modern Slavery and what to do if they suspect that this could be taking place within a supply chain.

Further Steps to Prevent Modern Slavery in our Supply Chains

Most of the services provided to PSG are of a professional financial services nature where there is a relatively lower risk of breaches of the requirements of the Modern Slavery Act. We believe that the areas where a higher risk exists is in the supply of services for our office facilities.

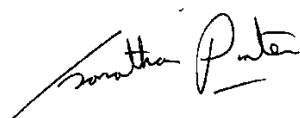
PSG's Property Services Department reviews all major suppliers on a periodic basis. Such a review resulted in terminating the contract with a company providing cleaning services to one of our regional offices as the supplier could not demonstrate its staff had the requisite work permits.

Assessment of Effectiveness in Preventing Modern Slavery

It is understood that Modern Slavery is not static and PSG will continue to develop its approach to mitigating this risk in the year ahead.

During the last 12 months, no reports were received from employees, the public, or enforcement agencies to indicate that Modern Slavery practices had been identified in any aspect of PSG's business operations.

This Statement was approved by the Board of Punter Southall Group Limited



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Jonathan Punter

Chairman

30 March 2023