

Slavery and Human Trafficking Statement

Introduction

This statement sets out Age Partnership Group Limited's (APGL) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January to 31 December 2017.

As part of the Financial Services sector, APGL recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

APGL is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of APGL including all of its subsidiaries:

APGL is one of the UK's leading over 50s finance specialists providing a range of services to our client base with the core business being the provision of equity release advice. The nature of the APGL's supply chain is that of general business suppliers as well as specialist services such as mortgages, insurance and pensions services.

We operate in and all of our supply chain is confined to the United Kingdom.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- APGL holds a Risk Register of all operations and regularly reviews this in the context of our supply chain and business operations
- There are no high-risk activities identified in relation to Modern Slavery or Human Trafficking.

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies** – These are developed jointly by the Finance, Operations, Compliance and Risk teams assessing our business activity and supply chain exposure, and are reviewed and approved by the Board
- **Risk assessments** – These are developed through consideration of our business activity, markets, and regions that we operate within through our Operations and Compliance functions
- **Investigations/due diligence** – Any known, or suspected, instances of slavery or human trafficking are investigated through our Compliance and Risk functions
- **Training** – To better understand and respond to potential slavery and human trafficking risks our employees are given awareness training, and our suppliers are also made aware of our expectations.

Relevant policies

APGL operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** – The organisation encourages all its workers, clients and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, clients or others who have concerns can raise their concerns with their line manager in the first instance. If this channel is not appropriate for any reason then disclosures should be made to either Human

Resources or a Director.

- **Employee Handbook** – The organisation's employee handbook makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supplier code of conduct** – The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** – APGL uses only specified, reputable employment agencies to source labour and would always verify the practices of any new agency before accepting workers (although in general we do not use agency staff due to the nature of our regulated business). This is done via a 'Preferred Supplier List' (PSL) and we use questionnaires and a full employee verification process to ensure that risks of slavery and human trafficking are addressed in relation to agency workers and all new hires.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments through the organisation's own staff or third-party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified
- Creating an annual risk profile for each supplier
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers, sometimes through a third-party auditor, and requiring them to implement action plans
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- Asking suppliers to confirm their compliance with our standards and requirements in order to provide products or services to our business; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring all staff to have completed training on modern slavery by June 2018
- Operating a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires all staff within the organisation to complete training on modern slavery as a module within the organisation's wider Ethics training programme.

The organisation requires all staff to sign up to one of a number of training sessions to complete an online training course by June 2018.

The organisation's modern slavery training covers:

- Our business purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation
- What external help is available, for example, through the Modern Slavery Helpline, Gang masters and Labour Abuse Authority and "Stronger together" initiative
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by distributing flyers to staff, putting up posters across the organisation's premises, and circulating a series of emails to staff.

The flyers/posters/emails explain to staff:

- The basic principles of the Modern Slavery Act 2015
- How employers can identify and prevent slavery and human trafficking
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation
- What external help is available, for example, through the Modern Slavery Helpline.

Board Approval

This statement has been approved by the organisation's board of directors and non-executive directors, who will review and update it annually.



Tim Loy
Chief Executive Officer
Date 11/04/2018