



Modern Slavery Act Statement

1. Introduction

This Statement is published in accordance with the requirements of the Modern Slavery Act 2015, which requires businesses to disclose the steps they are taking to tackle slavery, servitude, forced or compulsory labour and human trafficking (collectively known as 'modern slavery'). Our statement sets out steps taken by The Exeter Friendly Society Limited and its subsidiary companies, these are:

- Exeter Cash Plan Holdings Limited
- Exeter Cash Plan Limited
- Go Private Limited
- Pioneer Advantage Limited
- Exeter Friendly Members Club Limited

This statement is reviewed and updated on the website annually, this statement covers the business operation during the year ending 31 December 2021.

The Exeter respects all fundamental human rights and will be guided in the conduct of its business by the provisions of the United Nations Universal Declaration of Human Rights and in particular the articles which deal with discrimination, terms of employment, work life balance and adequacy of standard of living.

Our approach focusses on:

- Ensuring the business has in place a robust set of policies and governance procedures;
- Risk assessment, in particular when reviewing or entering into new relationships with suppliers;
- Due diligence;
- Training programme; and
- Monitoring suppliers, intermediaries, and service providers.

2. About The Exeter

We are a friendly society, specialising in health and life insurance, with links going back as far as 1888. We strongly believe in treating our members, business partners and people in our supply chains fairly. We acknowledge modern slavery is a pressing issue and we are committed to doing all we can to ensure that slavery and human trafficking does not take place in our business or our supply chains.

3. Our Business and Supply Chains

Our insurances are mainly sold through intermediaries who are all authorised and regulated by the Financial Conduct Authority and through their authorised representatives. Both we and selected business partners manage and administer members' policies. We work closely with our suppliers, intermediaries, and service providers to ensure we provide the best products to our members in the most ethical way possible.

Like other office-based financial services firms, we buy goods (stationery, office equipment, food), services (office cleaning, security, catering), IT supplies (hardware and software), travel and accommodation, and we negotiate contracts with numerous third-party administrators, IT service

providers and professionals in specialist fields. The majority of our suppliers are professional organisations delivering specialist services, knowledge and skills.

The risk that modern slavery could be part of our immediate supply chains continues to be assessed as extremely low. The Exeter's biggest exposure to inadvertently using or benefiting from modern slavery is most likely to arise from hospitality, security and office cleaning services supplied by third parties.

4. Measures taken to detect and eliminate the use of slave labour

Where possible we embed the philosophy (the requirements) of our policies into our relationship within our supply chain and our relationship with our business partners. During the year we continued to ensure rigorous review of any new suppliers and business partners, ensuring they undertake the necessary checks to eliminate slavery. As part of maintaining good business relations, we visit many of our intermediaries and suppliers on a regular basis to ensure there are no unethical or unsafe practices. However, during 2021 this was not always possible due to the pandemic, these reviews took place via video conference.

Our policy and governance framework addresses human rights and modern slavery which is supported by training. The policies that cover our framework are:

- Modern Anti-Slavery;
- Corporate Social Responsibility;
- Contracting for External Services and Resources;
- Contracts Management;
- Outsourcing & Third-Party Risk Management;
- Financial Crime;
- Recruitment and Selection; and
- Whistleblowing.

The Whistleblowing Policy provides colleagues with the ability to report confidentially any concerns, including modern slavery and human rights violations. Our policies have been approved by the Executive Committee and the Board. We aim to review all policies each year and update them where necessary.

5. Recruitment Process and Training

To ensure that we do not inadvertently directly employ anyone who might themselves be slaves, we continue to use robust recruitment processes that are fully compliant with UK employment and regulatory laws. We undertake 'right to work' document checks and also perform due diligence and background checks. We provide all our colleagues with an employment contract and provide market-related pay and rewards which are reviewed annually.

We also provided all colleagues with training, which has increased their awareness of the indicators of modern slavery in the workplace and the appropriate action to take if they suspect a case.

6. Due Diligence and Risk Assessment

Our approach to modern slavery forms part of a wider approach to risk management and delivering on our corporate social and ethical values. We continually assess and review the risk of modern slavery and human trafficking within the organisation and believe this is mitigated as a result of our policies and governance oversight. We expect the same level of responsibility from our suppliers and intermediaries and where necessary seek confirmation of this.

Each year, the Board considers matters regarding or raised under the whistleblowing process. During the year under review, no instances of modern slavery, or any other incidents of whistleblowing, were reported.

7. 2023 Commitment

We recognise that our duty to mitigate against the risk of modern slavery occurring in our supply chain is an ongoing responsibility. We will continue to:

- exert due diligence in our dealings with colleagues and service suppliers, investigate whether a third-party qualification system would benefit the business;

- use only authorised intermediaries, who hold the same level of integrity towards modern slavery, to sell its products, and their authorised representatives;
- undertake robust reviews of both existing and new supply chains; and
- train colleagues to maintain awareness.

8. Approved by the Board

This statement has been approved by the Board, pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes The Exeter's Slavery and Human Trafficking Statement for the financial year ending 31st December 2022.

**Isobel Langton
Chief Executive
The Exeter
June 2023**