

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## 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 2023.

## About us

We are a friendly society, specialising in health, protection, and life insurance. 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 ensuring that slavery and human trafficking does not take place in our business or our supply chains.

## Our approach

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. We also support behaviours which are consistent with International Labour Organisations (ILO) Core Conventions.

Our approach focusses on:

- Ensuring the business has in place a robust set of policies and governance procedures;

- Due diligence and risk assessment, in particular when reviewing or entering into new relationships with suppliers;
- Training programme; and
- Monitoring suppliers, intermediaries, and service providers.

## Our Business structure, Supply Chains and Risk Assessment

### Our Business Structure

Our insurance is 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.

### Supply Chains

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. We aim to use suppliers who are professional organisations delivering specialist services, knowledge and skills.

### Risk Assessment

Our primary risk area is within our supply chain and our secondary risk area is within our recruitment process.

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 is inadvertently using or benefiting from modern slavery, this is most likely to arise from hospitality, security and office cleaning services supplied by third parties. We overcome this by ensuring we are careful when we assess our service provider contracts.

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.

## Measures taken to detect and eliminate the use of slave labour

### Due Diligence

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 effectiveness of our controls and believe these risks are mitigated as a result. We require 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.

### Our policy and governance framework

Our policy and governance framework addresses human rights and modern slavery which is supported by training.

The policies that cover our framework are:

- Modern Slavery and Human Trafficking;
- Employee Code of Conduct;
- Environmental, Social & Governance;
- Contracting for External Services and Resources;
- Outsourcing & Third-Party Risk Management;
- Financial Crime;
- Recruitment and Selection; and
- Whistleblowing.

Our Whistleblowing Policy is proactively communicated with colleagues and supported by compulsory training programme for all colleagues. It 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.

### Training

We provide 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.

### Supply chain selection

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 make sure there is a 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 maintain contact with our intermediaries and suppliers on a regular basis to ensure there are no unethical or unsafe practices.

### 2024 Commitment

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

- exert due diligence in our dealings with colleagues and service suppliers;
- 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.

### 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 2023.

**Isobel Langton**  
**Chief Executive**  
**The Exeter**  
**June 2024**