

Modern Slavery Act Statement

In June 2018 our business, Quilter (formerly Old Mutual Wealth), separated from its parent company, Old Mutual, and listed on the London and Johannesburg stock exchanges as Quilter plc.

In accordance with the requirements of section 54(1) of the Modern Slavery Act 2015 (the Act) this Statement sets out the steps we are taking to prevent modern slavery taking place within our business or supply chain. This Statement was published in March 2018 after approval by the Board, however due to the corporate activity explained above it was updated in June 2018.

Together the Quilter group of companies* provide financial advice, investments and wealth management in the UK and selected international markets. We offer a multi-channel proposition with peer leading investment solutions for retail clients. We manage £111.6bn on behalf of over 900,000 customers and have over 4,000 employees (as at 31 March 2018).

Policies

We are committed to conducting business responsibly and upholding the highest standards of governance throughout our operations. Our Group Governance Manual sets out the policies, standards and processes by which the Group operates, and alongside this Statement, contains relevant policies such as our standards on human rights, human resources, Code of Conduct, Responsible Business, and Third Party Risk Management.

Our approach to human rights covers not only our supply chains but also our employees and contractors. As such we are committed to paying the national living wage in the UK and expect our suppliers who provide onsite services to do the same. We use both our Code of Conduct and Whistleblowing Policy to train and empower our employees to escalate any concerns and ensure they are suitably managed.

Our supply chains

Quilter's supply chain provides a wide range of products and services. These range from professional advice and business services to more operational services such as cleaning, catering and facilities support. As we aim to operate in an ethical manner, we expect the same of our suppliers.

We are in the process of aligning and standardising the procurement processes of all Quilter operating companies to our central third party risk management process. This will reduce scope for local variation and enable us to include modern slavery due diligence across the Group.

Our central supplier management process takes a risk based approach and includes a risk assessment of new suppliers based on the nature and value of the product or service being procured. As part of the vetting process, we require suppliers, in certain sectors or delivering certain services, to confirm that they have policies and training in place or follow standards designed to avoid slavery.

Our standard template supplier contracts, used centrally, include express obligations to comply with applicable laws and a clause specifically requiring compliance with the Modern Slavery Act. Where existing contracts relating to the supply of products or services are deemed to be at higher risk of modern slavery reach renewal, as part of the renewal process we will require the supplier to confirm its compliance with the Act.

Steps taken to date

In 2017 we committed to undertake a number of activities to identify risk in our supply chain, strengthen our response and train and engage our employees. As a result the business has redefined how we assess risk, taking a holistic approach to suppliers and sectors, which enabled us to identify any new risks and also align this risk process with those run by our risk team linked to other material matters to the business. We have implemented this holistic approach to assessing modern slavery business wide.

This process has enabled us to identify the suppliers with the highest risk of slavery and our priority has been on taking action for these higher risk suppliers. This has involved ensuring that our contracts are fit for purpose, and inserting specific Modern Slavery contractual wording where applicable, proactively gathering information

on the activities that our high risk suppliers are taking to address slavery, including reviewing their Modern Slavery Statements.

As well as taking action for our higher risk suppliers we ensure that our new contracts and any renewals have appropriate wording to address the risk of slavery. Internally, a training module on modern slavery is being rolled out as part of our annual Code of Conduct training and we are in the process of signing off a Supplier Code of Conduct to help support our engagement programmes. Whistleblowing remains a clear route to raise concerns and we are ensuring that this approach is clearly communicated to all stakeholders.

Next steps

Going forward and building on our activity in 2017 we are likely to take the following actions:

- Further develop our enterprise wide management of third party risks, including modern slavery and other relevant risks such as information security
- Build modern slavery into our supplier assurance processes
- Roll out the Supplier Code of Conduct to our higher risk suppliers
- Review and update this statement and our human rights statement annually.



Paul Feeny
Chief Executive, Quilter plc