

Modern Slavery Act Statement

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 June 2019 following approval by the Quilter plc Board¹.

Together the Quilter group of companies² provide financial advice, investments and wealth management in the UK and selected international markets. Quilter plc is a leading wealth management business in the UK and internationally, helping to create prosperity for the generations of today and tomorrow. Quilter plc oversees £109.3 billion in customer investments (as at 31 December 2018). Quilter plc's financial year end is 31 December. Quilter plc, our ultimate parent company, is incorporated in England and it has subsidiaries in various jurisdictions. Details of our subsidiaries and the countries in which they are incorporated, as well as our businesses, are set out in our Annual Report and Accounts 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. We aim to operate in an ethical manner and 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 uniformly 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 2018 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 potential 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 and rolling out our Supplier Code of Conduct. As well as taking action for our higher risk suppliers, where appropriate, we ensure that our new contracts and any renewals have suitable wording to address the risk of slavery.

Internally, all colleagues are made aware of modern slavery through a compulsory annual training programme. Our whistleblowing policy enables our colleagues to raise concerns should they arise and we are ensuring that this approach is clearly communicated to all stakeholders.

Next steps

Going forward and building on our previous activity we plan to take the following actions:

- Complete the roll out of our enterprise wide management of third party risks, including modern slavery and other relevant risks such as information security;
- Update our tender documentation to include our Supplier Code of Conduct;
- Ensure that all new suppliers are made aware of our Supplier Code of Conduct, as part of their on-boarding process; and
- Review and update this statement annually.



Paul Feeny
Chief Executive, Quilter plc

¹ This Statement has been approved by the Quilter plc Board of Directors and is made according to the requirements of Section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2018. This Statement applies to all companies within the Quilter group that are required to have a modern slavery statement.

² The business is comprised of two segments: **Advice and Wealth Management** and **Wealth Platforms**.

Advice and Wealth Management encompasses the financial planning network, Intrinsic; Quilter Private Client Advisers; the discretionary fund management business, Quilter Cheviot; and Quilter Investors, the Multi-asset investment solutions business.

Wealth Platforms includes the Old Mutual Wealth UK Platform; Old Mutual International, including AAM Advisory in Singapore; and the Old Mutual Wealth Heritage life assurance business.